Museum of Australian Democracy
at Old Parliament House

Privacy Policy

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Director

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MOAD

Version Control

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1. Introduction

The Museum of Australian Democracy at Old Parliament House (MoAD) is a living museum of social and political history, located in a nationally listed heritage building in Parkes, Canberra.

MoAD helps people to understand Australia's social and political history by interpreting the past and present and exploring the future. MoAD achieves this by:

- bringing alive the importance of democracy in the lives of Australians
- interpreting, conserving and presenting the building and our collections
- providing entertaining and educational public programs; and
- providing a range of other services that enhance the visitor experience.

2. Purpose

The purpose of this policy is to outline MoAD's obligations for managing personal information in accordance with the Australian Privacy Principles (APPs) as specified in the *Privacy Act 1988*.

This policy describes the kinds of personal information MoAD collects and holds, how and why we collect that information and the purposes for which we use and disclose the information. It also provides details of how an individual can access their personal information and seek its correction, and our complaint handling process.

3. Why MoAD collects personal information

MoAD only collects personal information that is required to undertake a particular function or activity, including where required by law. The main way MoAD collects personal information is when it is given to MoAD, for example, when people:

- subscribe to MoAD's newsletter
- apply for employment
- book a ticket for an event or program
- join MoAD's Volunteer program
- become a financial donor
- offer objects for donation to MoAD's Collection
- loan objects to MoAD for an exhibition
- provide goods and services to MoAD
- make a complaint or provide feedback on MoAD's services
- Interact with us via social media
- interact with us via our website.

MoAD will not collect personal information unless the individual consents and the information is necessary or directly related to our functions or activities. MoAD will only collect personal information by lawful and fair means and will generally collect the information from the individual personally, although in some cases MoAD' may receive information from third parties such as a representative from an organisation associated with making donations.

4. Sensitive personal information

There is a distinction in the Privacy Act between personal information and 'sensitive information'. Sensitive personal information includes information or opinion about an individual includes; racial or ethnic origin, political opinions, associations memberships, religious beliefs, sexual orientation, criminal history, health or genetic information.

MoAD will not collect this personal information unless the individual consents and the MoAD Executive has deemed that the information is reasonable, necessary and directly related to MoAD's functions or activities.

5. How personal information is held and protected

MoAD is committed to taking all reasonable steps to protect personal information from misuse and loss. Strict procedures and standards are followed to prevent unauthorised access to, modification, and disclosure of personal information in MoAD's possession and control.

MoAD's online and IT systems are managed in accordance with the Australian Government Protective Security Policy Framework and the Australian Government Information Security Manual.

Access to personal information is strictly controlled. For example, password protection is implemented for accessing electronic IT systems, paper files are secured in locked cabinets and physical access is restricted to people performing relevant functions.

Storage of information (and the disposal of information when no longer required) is managed in accordance with Australian Government records management regulations, guidelines and authorities, including the *Archives Act 1983*, Records Authorities and General Disposal Authorities.

6. Categories of information

6.1. Personnel and employment records

MoAD collects a range of personal information from its employees, prospective employees and Board members. These records are used to administer matters relating to a person's employment or duties with MoAD. The information is generally collected directly from each individual. Personal information, with consent from employees/applicants may also be collected from an employee's supervisor, other employees, recruitment agents and personnel providers, and from previous employers when it is relevant to a selection process.

6.2. Donor information

MoAD collects information, including financial information about donors, or prospective donors, including when donors make a financial donation or donate an object to MoAD. Financial donations are collected in a range of ways including through MoAD's annual appeal, directly though the website and other digital or hard copy forms. If you make a financial donation, MoAD will collect and hold personal information to administer the

donation and supply tax receipts. If a donor consents, their donation may be publicly acknowledged but donors can elect to be anonymous.

When a person makes a donation, they will be provided with information about how their personal information will be handled.

6.3. Volunteer records

Volunteers play an important role in MoAD's operation. The majority of volunteers work as guides, helping us to share the story of Australian democracy with MoAD's visitors. Information is collected directly from each individual and usually includes personal and contact details. Medical information is collected to assess a volunteers' physical ability to perform their role. MoAD also collects a copy of each volunteers' Contact with Vulnerable People registration card. The information is used to maintain a current contact list to manage and administer the volunteer program.

6.4. Contractor and supplier information

Personal information relating to all contractors who are inducted to the OPH site is also collected. This may include personal and contact information from security, catering and cleaning staff employed under contract with the service provider, along with contractors and advisors, exhibitions and heritage curators/advisors and product suppliers. The personal information is collected and used for the purposes of managing the MoAD's relationship with the contractor and for security.

6.5. Bookings, promotions and events information

MoAD holds a range of events and public programs, many of which are ticketed. MoAD Ticketing Terms and Conditions are published on our website. Ticket holders may opt in if they wish to receive news or invitations to events from MoAD and the contact and preference information they provide may be used to generate broad statistical and demographic data. If you participate in events or promotions, or become a donor, MoAD will use your contact details to generate invitation lists for future MoAD events or promotions. You can opt out of our mailing list or from receiving invitations at any time.

6.6. Security records (including CCTV)

MoAD maintains security records in order to manage access to our premises, assets or information. These records relate to staff, volunteers, and contractors; and may include pre-employment checks and Australian Government Security Clearances. Photographic security identification passes are also used for identification and access control. The information is held in electronic and paper formats and is accessed by the Agency Security Advisor and Human Resources staff; and in the case of security ID passes, staff from MoAD's contracted guarding service provider.

A series of closed circuit television (CCTV) cameras, to monitor and record activity, are installed both around and throughout the OPH building. The purpose of this monitoring is to provide a safe and secure environment for staff, tenants and visitors and to protect our collections and exhibits from damage, theft or loss.

Signs are displayed at all entries to the building to notify individuals of the presence of the cameras and surveillance footage that is captured by these cameras is considered to be

personal information. Surveillance footage is held electronically on dedicated secure servers, and is accessible by the Agency Security Advisor and staff from MoAD's contracted guarding service provider. Information is not released to any person or party except for enforcement related activities conducted by, or on behalf of, an enforcement body. CCTV recordings are generally retained for a period of 90 days, and then deleted permanently unless retained as records of an incident.

6.7. Collection Management

Whilst this policy does not apply to personal information contained in MoAD collection material; it does apply to personal information held in records that support the collection. For example:

- details about an object's history and significance, including current and previous owners which is used to assess an object's ownership and provenance prior to acquisition or loan
- personal and contact information on donors, lenders and vendors
- personal information required to arrange physical access to the collection by researchers, family members or other interested parties
- personal information required to manage an object (eg, transportation or insurance)
- personal and contact information relating to the management of oral history interviews.

The above information is usually collected directly from an individual, but it may also be collected from other sources.

Please see MoAD's Collection Management Procedures for guidance on managing personal information in MoAD collection material.

7. Online engagement

7.1. Website

MoAD's website is hosted by a cloud based provider, Amazon Web Services. For more information on Amazon Web Services privacy policies please refer to their website.

No attempt will be made to identify users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the service provider's logs.

7.1.1. Cookies

Cookies are small amounts of information that are created and stored on a user's computer and used by the web host server for a variety of purposes, including gathering information about user's access to a website or improving the functionality of a web site by remembering a user's preferences.

7.2. Email marketing

MoAD uses a permission-based email marketing platform. This means MoAD' only sends marketing material to those who have signed-up or provided their consent to receive this material. All of MoAD's email marketing material contains an unsubscribe link that allows the user to opt-out of receiving future messages. If MoAD' no longer needs the personal information of a subscriber the data is destroyed or de-identified.

7.3. Social media

MoAD uses social media channels such as blogs, Facebook, Twitter, Instagram and YouTube to increase audience awareness, engagement, and participation in MoAD's activities and products.

When individuals communicate with MoAD using these channels, MoAD may collect some personal information.

MoAD will collect and retain personal information relating to competitions run on social media. Information relating to prize recipients will be maintained for financial accountably and auditing purposes. This information will be securely stored, not shared with third parties and not used for any other purposes.

7.4. Wireless network

The MoAD network provides the Wi-Fi, intranet and internet services for exhibitions, events, and public.

As it currently does not connect to the Corporate Network and does not contain private customer or employee data it is not required to adhere to all of the policies and guidelines described by government.

8. Disclosure of personal information

MoAD will not disclose personal information to anyone outside the agency unless the individual concerned has given their consent, or disclosure is otherwise permitted by the Australian Privacy Principles. Examples of exceptions include disclosure being necessary to prevent a serious threat to a person's life, health or safety, or for law enforcement purposes.

Personal information held by MoAD will only be released to contractors where it is necessary for the contractor to perform their job. If personal information is given to a contractor, the written contract will contain the appropriate privacy clauses as recommended by the Privacy Commissioner.

9. Accessing and correcting your personal information

Under the *Privacy Act* you (as an individual) have rights to access and correct personal information that MoAD holds about you.

You also have similar rights under the *Freedom of Information Act 1982* (Cth). More information about MoAD's FOI procedures can be found on our website.

If you request access to the personal information that MoAD holds about you, or you request MoAD changes that personal information because it is incorrect, MoAD will allow access or make the changes unless MoAD considers that there is a sound reason under the *Privacy Act* or other relevant law to withhold the information or not make the changes.

There are no charges imposed on requests for access to personal information and correction of personal information held by MoAD.

MoAD aims to ensure that the personal information we hold is accurate, up-to-date, complete, relevant and not misleading.

Please contact the Privacy Officer (see details below) if you would like to seek access to, or correct, the personal information MoAD holds about you.

10. Complaint handling process

All complaints about how MoAD has handled your personal information should be in writing. If you need help lodging a complaint, you can contact us.

The Privacy Contact Officer will investigate all complaints and determine whether MoAD has breached its privacy obligations.

MoAD will tell you promptly that we have received your complaint and then respond to the complaint within 30 days.

If you are not satisfied with our response you may ask for a review by the Deputy Director or you can lodge a complaint with the Office of the Australian Information Commissioner.

Contact details for the Commissioner are available on their website here.

10.1. How to make a complaint or contact the Privacy Officer

Written complaints or queries should be addressed to:

Privacy Contact Officer
Museum of Australian Democracy at Old Parliament House
PO Box 3934
Manuka ACT 2603

Email: governance@moadoph.gov.au