

CMET Privacy Policy

Contents

Definition of terms.....	2
About this Policy	3
Your Privacy	4
Overview	4
The information we collect.....	4
How we collect personal information.....	5
Notice of Collection.....	5
Social Media and Email Correspondence.....	6
Facebook, Instagram, and LinkedIn	6
Email distribution lists.....	6
Use and Disclosure.....	6
Complaints, contact information, and change requests.....	7
Storage and security of personal information	8
Cookies Policy	8
Use of Google Analytics	8
Information Collected	9

Definition of terms

Privacy Act	Privacy Act 1988 (Cth)
Personal Information	<p>Under the <i>Privacy Act 1988</i> personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none"> (a) Whether the information or opinion is true or not; and (b) Whether the information or opinion is recorded in a material form or not.
Sensitive Personal Information	<p>Under the <i>Privacy Act 1988 (Cth)</i> sensitive information means:</p> <ul style="list-style-type: none"> (a) Information or an opinion about an individual's: <ul style="list-style-type: none"> i. racial or ethnic origin; or ii. political opinions; or iii. membership of a political association; or iv. religious beliefs or affiliations; or v. philosophical beliefs; or vi. membership of a professional or trade association; or vii. membership of a trade union; or viii. sexual orientation or practices; or ix. criminal record. <p>that is also personal information; or</p> (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information; or (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or (e) biometric templates.
APPs	Australian Privacy Principles under the <i>Privacy Act 1988 (Cth)</i>

About this Policy

This policy sets out how Canberra Metro Operations (CMET) collects and manages personal information. We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act) and the Territory Privacy principles (TPPs) in the Information Privacy Act 2014 (ACT). The APPs/TPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.aaic.gov.au and the Territory Privacy Principles from the ACT Legislation Register at www.legislation.act.gov.au

This policy operates in conjunction with Transport Canberra and City Services (TCCS) privacy obligations such as the MyWay Privacy statement.

Updates will be made to this policy as changes are made to the governing privacy legislation.

Your Privacy

Overview

CMET collects personal information for legal and administrative reasons. This may include but is not limited to:

- Complaints, Compliments and Enquires from the public
- Applications for Permit to Work
- Lost property and compensation claims
- Records of meetings, committees, and councils
- General communication including media, community engagement and social media.
- Career Enquiries

At all times CMET will only collect personal information where that information is necessary to perform one or more business functions or activities.

The information we collect

CMET will always only collect the minimum information required. The information we collect, and hold will vary depending on the purpose of the collection.

Personal information we require may include but is not limited to:

- Your name, address and contact details (e.g., phone, mobile and email)
- Information to confirm your identity (e.g., date of birth, country of birth, passport details, visa status and drivers' licence)
- Government agency identification (e.g., working with Vulnerable People, Medicare Card and Rail Association identification)
- Information about your personal circumstances (e.g., age, gender, marital status, and occupation)
- Information about your finances (e.g., payment details, bank account details)
- Information about your employment (e.g., applications for employment, work history, referee comments and remuneration).

Where you are applying for a permit to work, access to the network or for employment you may be required to submit sensitive personal information.

Sensitive information

CMET only collects sensitive information about an individual where the individual consents to the collection of the information and where it is directly related to meeting statutory obligations to undertake business activities and functions.

Sensitive personal information is handled with additional protections under the *Privacy Act 1988 (Cth)*

Types of sensitive information we collect may include but is not limited to:

- Health Information of an individual
- Criminal record
- Racial or ethnic origin
- Membership of a professional or trade association
- Membership of a trade union

How we collect personal information

CMET only collects personal information by lawful and fair means.

Personal information may be provided to CMET via online forms, paper, and digital correspondence as well as over the phone. Personal information may be forwarded to CMET by third parties or government agencies with authorisation by the individual.

CMET may collect personal information such as contact details and feedback when:

- We are required or authorised by law, court, or tribunal order to collect information
- You participate informal surveys, community consultations, forums or make submissions to us.
- You contact us to ask for more information or request assistance.
- You participate in meetings and consultations with us.
- You ask for access to information stored about you by CMET.
- You apply for employment or request access to the network for works

Notice of Collection

When CMET requests to collect your personal information, we will notify you about:

- Who we are and how to contact us
- How we collect the information
- Why we need to collect the information
- The details of any third parties or Government Agencies the information may be shared with if permitted by the individual

- How you can access this privacy document to explain our privacy principles and our information handling practices

Social Media and Email Correspondence

Facebook, Instagram, and LinkedIn

CMET uses social media networking sites as a communication tool to advise of changes to service, safety announcements and community engagement. Social media is also used as a two-way communication tool with the public. Information provided to CMET in social media comments and direct messaged will be managed in accordance with the Privacy Act 1988. [Facebook](#), [Instagram](#) and [LinkedIn](#) each have privacy policies in place for how they collect and manage personal information.

Email distribution lists

The purpose of our newsletter communication is to inform the audience of changes within the network and community activities by subscription only. Information on how to unsubscribe from our email distribution list is made available on each email. We currently use [Mailchimp](#) for email distribution. You can find out more information about their privacy policy on their website.

Use and Disclosure

Under APP 6 if CMET holds personal information about an individual that was collected for a particular purpose (the primary purpose) then we must not use or disclose the information for another purpose (the secondary purpose) unless:

1. The individual has consented to the use or disclosure of the information; or
2. Exemptions to this include:
 - a. the individual would reasonably expect CMET to use or disclose the information for the secondary purpose and the secondary purpose is:
 - i. if the information is sensitive information—directly related to the primary purpose; or
 - ii. if the information is not sensitive information—related to the primary purpose; or
 - b. the use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or

- c. a permitted general situation exists in relation to the use or disclosure of the information by CMET; or
- d. CMET is an organisation, and a permitted health situation exists in relation to the use or disclosure of the information by the entity; or
- e. CMET reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

In accordance with the Privacy Act 1988, CMET may disclose personal information that is reasonably necessary for a law enforcement-related activity such as the prevention, detection, investigation, prosecution or punishment of criminal offences or breaches of the law, intelligence gathering, surveillance and conduct of protective or custodial services.

Complaints, contact information, and change requests

CMET takes all reasonable steps to ensure that any personal information we collect is accurate, up-to-date, and complete. In some cases, we are not able to maintain information without requesting clarification from the individual. Individuals have the right to request changes be made to the storage of the personal information including but not limited to amending and deleting the information on file. There are some circumstances where it may not be possible to completely remove all personal information if we are required by law to keep that information. In this instance CMET will provide the individual with our justification to reject the changes within 30 days of the request. If unhappy with the rejection of a change request the individual can file a complaint with the Office of the Australian Information Commissioner (OAIC). The Australian Privacy Commissioner is an impartial third party when it investigates a complaint. For more information on OAIC please visit: <https://www.oaic.gov.au/>

If you have any queries or complaints about our Privacy Policy, please contact us at:

Canberra Metro Operations Pty. Ltd. (CMET)
PO Box 819
Mitchell ACT 2911
Email: Info@cmet.com.au

Storage and security of personal information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification, or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Cookies Policy

Use of Google Analytics

This website uses Google Analytics, a web analytics service provided by Google Inc. (Google). Google Analytics uses cookies and JavaScript code to enable analysis on usage of this website. The data collected about your use of this website, (including your IP address) will be transmitted to and stored on Google's servers. Google uses this data for the purpose of compiling reports on website activity and providing other services relating to website activity and internet usage.

Google will not collect personal information about you and the reports provided by Google will only contain aggregate non-personal data about your use of our website. These reports may contain data relating to pages viewed, files downloaded or the completion of online subscriptions.

We use the data collected by Google Analytics to improve how our website functions. For example, we use the data to check whether visitors experience problems finding information and make access to information as easy as we can.

Google may transfer this data to third parties where required to do so by law, or where third parties process this data on Google's behalf. Google will not associate your IP address with any personal information you may have previously provided to Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that if you do this, you may not be able to fully use this website.

By using our website, you consent to the processing of data about you by Google in the manner and for the purposes stated.

Information Collected

When you browse our website, our system automatically makes a record of your visit and logs the following information for statistical purposes:

- your server address
- top level domain name (e.g. .com, .net, .gov, .au etc)
- the type of browser and operating system you used
- date and time of your visit
- the previous site visited
- which pages are accessed
- the time spent on individual pages and the site overall
- which files were downloaded.

No attempt will be made to identify individual users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency (e.g. Australian Federal Police) exercises a warrant to inspect our service provider's log files. This information is analysed to determine the website's usage statistics.