



Procedure

Information Privacy

Endorsed: 20 June 2014

Brief description

Gladstone Ports Corporation Limited ("**GPC**" or "**we**", "**us**" or "**our**") is committed to protecting the privacy of any personal information we hold about individuals.

We are bound by the Australian Privacy Principles and the *Privacy Act 1988* (Cth) (the "**Act**") and will meet our requirements in our dealings with you. GPC has implemented measures to comply with its obligations under the Act.

As we are a Queensland Government owned corporation, the information privacy principles in the *Information Privacy Act 2009* (Qld) do not apply to us. However, certain obligations in the *Information Privacy Act 2009* (Qld) to grant access to personal information we hold, do apply to us.

This Information Privacy Procedure sets out, in general terms, how we manage personal information, including, generally, the kinds of personal information we may collect, the purposes for which we may collect it and how we hold, use and disclose personal information.

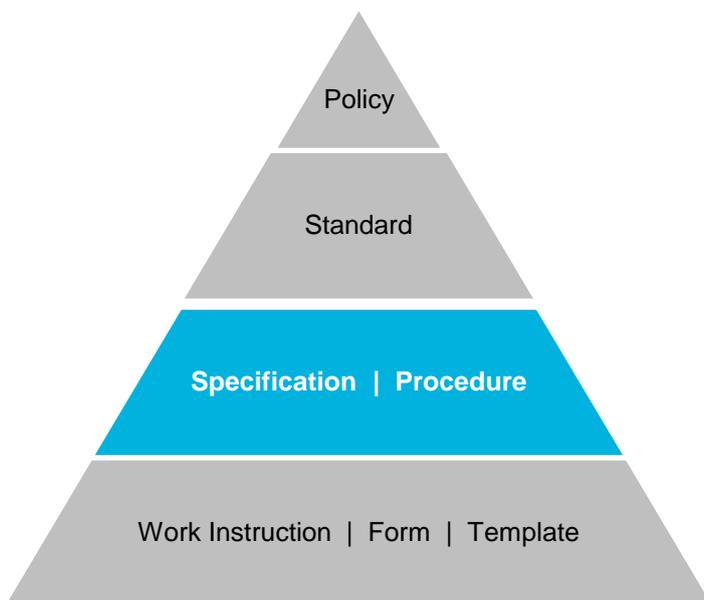
This document is a PROCEDURE.

A PROCEDURE sets out a way of performing or conducting business and activities. It contains a series of actions or operations to be completed in a particular order or manner.

A PROCEDURE is designed to comply with regulatory obligations and good business practices.

A PROCEDURE is approved by the relevant General Manager.

The document hierarchy provides a visual representation of Gladstone Ports Corporation's approved Governance Document Hierarchy Framework.



Tier 1 – Documents in this tier will explain **WHY** we are going to do what we say we are going to do.

Tier 2 – Documents in this tier will explain **WHAT** we are going to do.

Tier 3 – Documents in this tier will explain **HOW** we are going to do what we say we are going to do.

Tier 4 – Documents in this tier are the tools **WITH** which we ensure we do the things we say we are going to do.

This document contains confidential material relating to the business and financial interests of Gladstone Ports Corporation Limited. Gladstone Ports Corporation is to be contacted in accordance with Part 3, Division 3 Section 37 of the *Right to Information Act 2009* should any Government Agency receive a Right to Information application for this document. Contents of this document may either be in full or part exempt from disclosure pursuant to the *Right to Information Act 2009*.

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1. Procedure statement

Gladstone Ports Corporation Limited ("GPC" or "we", "us" or "our") is committed to protecting the privacy of any personal information we hold about individuals.

We are primarily bound by the Privacy Act 1988 (Cth) (the "Act") and will meet its requirements in our dealings with you. GPC has implemented measures to comply with its obligations under the Act.

GPC is a Queensland Government owned corporation, therefore the information privacy principles in the Information Privacy Act 2009 (Qld) do not apply to us however, certain obligations in the Information Privacy Act 2009 (Qld) to grant access to personal information we hold, do apply to us.

This Procedure sets out, in general terms, how GPC manages personal information, including, generally, the kinds of personal information we may collect, the purposes for which we may collect it and how we hold, use and disclose personal information.

2. Procedure scope

2.1 Why does GPC collect my personal information?

GPC collects your personal information to allow us to perform our business functions. This may include:

- providing you with any service provided by GPC, including executing instructions and complying with our legislative and regulatory obligations relating to the service;
- improving our services;
- meeting our ongoing obligations to you in providing you with the service;
- meeting our external obligations, such as with regard to third party systems and relationships, in order to provide you with the service;
- meeting our obligations and performing our functions under applicable laws, such as the *Transport Infrastructure Act 1994* (Qld), the *Government Owned Corporations Act 1993* (Qld) and the *Corporations Act 2001* (Cth) and other legislation;
- verifying your identity;
- notifying you of changes to our services;
- investigating potential fraud or misconduct, and protecting you against fraud; and
- contacting you with information about services that you might be interested in.

2.2 What personal information does GPC collect?

The types of personal information GPC collects will depend on the nature of your dealings with us and may (but does not always) include:

- your name;
- gender;
- date of birth;
- address;
- personal and/or work contact details (e.g. phone numbers and email addresses);



- banking/payment details (e.g. account numbers, credit card numbers);
- Information about your use of GPC websites collected through cookies;
- any other information we collect as part of a survey, your feedback, or complaints, or a competition you enter.

If necessary, we may also ask you to provide us with additional personal information from time to time.

2.3 How does GPC collect your personal information?

GPC generally collects personal information directly from you. That collection generally occurs when you:

- request information from, or have dealings directly with us; or
- access or request information from our website.

In some circumstances however, GPC may also collect your personal information from third parties, but where we do so, we seek to ensure that we act in accordance with relevant privacy laws.

2.4 How does GPC use your personal information?

GPC uses your personal information for purposes including (but not limited to):

- *providing you with the GPC services you request;*
- *promoting and marketing GPC's current and future services to you;*
- *informing you of upcoming events, special promotions and offers and other matters which GPC considers may be of interest to you; and*
- *to improve the operation or navigation of GPC's website.*

GPC may also use your personal information for other purposes not listed above which will be made clear to you at the time GPC collects that information, or for such purposes as may be required or permitted by law.

2.5 Will GPC give your personal information to anyone else?

As part of providing you the information or services you request, GPC may disclose your personal information to:

- *GPC's related companies;*
- *GPC's consultants, contractors and service providers performing services including (but not limited to) legal and accounting services, credit reporting, transport, and printing services; and*
- *Government agencies or bodies (including the Police Force) where requested.*



Other than those third parties referred to above, GPC will not disclose your personal information to any other third party unless it has reasonable grounds to believe:

- *you have authorised GPC to do so;*
- *your safety, or the safety of others in the community, is at risk; or*
- *GPC is required or permitted by law to do so.*

If GPC provides your personal information to a third party, GPC generally requires the third party to protect your personal information in the same way GPC does.

GPC does not generally disclose information outside of Australia. GPC may disclose personal information to overseas recipients where it has reasonable grounds to believe:

- *you have authorised GPC to do so;*
- *your safety, or the safety of others in the community, is at risk; or*
- *GPC is required or permitted by law to do so.*

2.6 Is your personal information secure?

GPC takes reasonable steps to ensure personal information we holds about you is protected from risks such as loss, unauthorised access, use, destruction, modification or disclosure. Such steps include: written confidentiality and security policies that apply to all our employees;

- *security measures for access to our systems and premises and for document and file storage;*
- *reasonably limiting internal access to stakeholder' personal information to staff who require it to fulfil our obligations and related matters; and*
- *firewall and data encryption measures protecting our websites.*

No data transmission over the internet is totally secure. As a result, any personal information you send to GPC over the Internet (including via email) is sent at your own risk.

2.7 Your rights of access and correction

The accuracy of your personal information is important. GPC takes reasonable steps to ensure personal information we hold about you is accurate, complete, up-to-date, relevant and not misleading. If you believe that any personal information GPC holds about you is incorrect, please contact the Privacy Officer, on the details set out below.

You have rights to access the personal information we hold about you pursuant to both the *Privacy Act 1998* (Cth) and the *Information Privacy Act 2009* (Qld). You may contact the Privacy Officer to request details of your personal information as follows:

- a. Privacy Officer
Gladstone Ports Corporation Limited
PO Box 259
Gladstone Qld 4680

- b. Alternatively [email the Privacy Officer](#)



Applications must be made using the approved form (see section 44 of the Information Privacy Act. The link to the current approved form is as follows: -

<https://www.smartservice.qld.gov.au/services/information-requests/home.action>.

GPC can deny your request in some circumstances and if it does so, will provide you with written reasons for that denial.

While there is no fee for requesting access to the personal information GPC holds about you, GPC reserves the right to charge a reasonable fee for the preparation and provision of that information to you.

You also have rights to request the correction of personal information which GPC holds about you under both the *Privacy Act 1998* (Cth) and the *Information Privacy Act 2009* (Qld). You may do so at any time by contacting the Privacy Officer on the details set out above. GPC does however reserve the right to refuse to correct your information in some circumstances. If GPC refuses to correct any personal information about you, and subsequent agreement cannot be reached between the parties on this issue, you may request that a note or statement regarding the correction requested be attached to your personal information.

2.8 How do I obtain more information or lodge a privacy complaint?

If you:

- require further information regarding this Procedure or any other steps GPC has taken to protect your personal information or privacy; or
- have any concerns or a complaint regarding GPC's privacy practices or its management of your personal information

please inform the Privacy Officer as follows:

- a. Privacy Officer
Gladstone Ports Corporation Limited
PO Box 259
Gladstone Qld 4680
- b. Alternatively [email the Privacy Officer](#)

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3. Monitoring and review

GPC reserves the right to change this Information Privacy Procedure from time to time. If we change this Procedure, we will post a copy of the updated Procedure on our Website and your continued use of the website following that posting will constitute your acceptance of the terms of the updated Procedure.

4. More information

This Procedure will be available to all employees, contractors, consultants and stakeholders.

This document is uncontrolled when printed. The current version of this Procedure is located on Gladstone Ports Corporation's Intranet.

If you require any further information, please contact the Facilitator, listed under Document Accountability, section 6.2.

5. Procedure statement

5.1 Gladstone Ports Corporation Charter

GPC appreciates the importance of protecting your personal information and recognise the trust placed in us when you supply your personal information to us. We are committed to protecting the privacy and security of personal information obtained from individuals. GPC's commitment is embodied in our Corporation Charter.

Vision: To be the most respected Ports Corporation in the Nation.

Mission: To responsibly manage, develop, and operate port facilities and services for the sustainable economic growth and social prosperity of our region, Queensland and Australia.

Values

- **SUSTAINABILITY:** We preserve the inherent worth of Port assets for future generations. We protect the health and safety of our people, the environment and our community. We engage with and contribute to the communities in which we operate.
- **EXCELLENCE:** We continually strive for excellence in all that we do and constructively challenge for a better way. We are open to learning and appreciate that shared knowledge and innovation are essential to our growth.
- **CUSTOMERS:** We serve our customers and the Port community with pride and passion. We respond with urgency, anticipate their needs, and exceed their expectations.
- **RESPECT:** We build relationships based on equality, dignity, honesty and trust. In all our dealings we strive to be friendly and courteous, as well as fair and compassionate.



- **EMPOWERMENT:** We support and empower people to give their best and reach their potential. We fully apply our skills and capacity, are accountable in our actions, and perform to the best of our ability.
- **TEAMWORK:** We are one company, one team. We work together to achieve our objectives.

6. Document history

6.1 Document information

Current version	1
First released	25 August 2011, former format (#680705)
Last updated	26 May 2014
Effective by	1 July 2014
Review frequency	Within two (2) years, or as required
Review before	1 July 2016
Audience	Board, CEO and Executive, all employees, contractors, consultants and stakeholders

6.2 Document accountability

Term	Definition	Position
Owner	Accountable for approval and authorised discretion to implement or significantly change the system	CEO and/or Board
Custodian	Accountable for monitoring the application of the system and advising the owner of the monitoring outcomes	Chief Executive Officer (Level of Work V)
Facilitator	Accountable for proposing system design or redesign and facilitation of conformance	Company Secretary (Level of Work IV)

6.3 Document version control

Version	Date	Author	Change description
8(#680705)	August 2011	Company Secretary	Board approval required.
	June 2014	Company Secretary	Replaced with new format and updated due to Privacy Law Reform in March 2014. Presented for Management approval.



7. Appendices

Appendix 1 – Related Documents

Legislation and regulation

Key relevant legislation and regulation, as amended from time to time, includes but is not limited to:

Type	What
Federal Acts	<i>Privacy Act 1988 (Cth)</i> <i>Corporations Act 2001 (Cth)</i>
State Acts	<i>Information Privacy Act 2009 (Qld)</i> <i>Government Owned Corporations Act 1993 (Qld)</i>
Other	<i>Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Amendment Act)</i> <i>Privacy Regulation 2013</i>

Guiding principles

The following guiding principles relate to this Procedure:

Type	What
GOC Principles	<ul style="list-style-type: none">• Corporate Governance Guidelines for Government Owned Corporations• Government Owned Corporations Release of Information Arrangements• Foundations of management and oversight• Promote ethical and responsible decision-making• Safeguard integrity in financial reporting• Make timely and balanced disclosures• Recognise and manage risk
GPC Principles	Draw from GPC Values: <ul style="list-style-type: none">• Sustainability• Excellence• Customer• Respect• Empowerment• Teamwork

Gladstone Ports Corporation documents

The following documents relate to this Procedure:

Type	What
Standard	GPC Code of Conduct
Specification (#1095643)	For internal use only.