

## PRIVACY POLICY

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|---------------------------|---------------------------|------------------------------|------------|
| <b>Policy category</b>    | Probity                   | <b>Group Application</b>     | BHC        |
| <b>Drafted by</b>         | Risk & Compliance Manager | <b>Version</b>               | V1.0       |
| <b>Delegated updates</b>  | DCEO/COO                  | <b>Last approved</b>         | April 2026 |
| <b>Responsible person</b> | CEO                       | <b>Scheduled review date</b> | April 2029 |

## GENERAL

The purpose of this Privacy Policy is to ensure Brisbane Housing Company Limited ACN 101 263 834 and each of its related entities (together, **BHC, we, us** or **our**) comply with legislative requirements in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**) and any other relevant privacy legislation or code governing the way in which BHC manages personal information (including the *Information Privacy Act 2009* (Qld) and Information Privacy Principles (**IPPs**) when delivering services on behalf of the Queensland Government or otherwise required by the Queensland Government to do so in a particular context).

## PRINCIPLES

BHC is committed to ensuring that privacy and confidentiality are respected and upheld in matters relating to BHC. BHC acknowledges an individual's right to privacy and will ensure that the collection, storage, use and disclosure of personal information is managed in accordance with our legal obligations.

We will update this Privacy Policy if our information handling practices change. Any revision to this Privacy Policy will take effect when it is published on our website. We encourage you to check our website regularly for any updates to this Privacy Policy.

## APPLICATION

This Privacy Policy is an external facing policy relevant to anyone who uses BHC's services (such as residents and tenants) or otherwise interacts with BHC, including clients and other stakeholders. Depending on how you engage with us, you may be provided with additional privacy-related information to supplement this Privacy Policy.

## COLLECTION

### Types of information collected

#### **Personal information**

We may collect and hold personal information about you, that is, information that identifies you or can reasonably be used to identify you and is relevant to providing you with the services you are seeking.

BHC collects and solicits personal information from visitors to its sites, tenancy applicants, tenants/residents and members of tenants/residents' households and other relevant stakeholders.

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Depending on your relationship with us, the kinds of information we typically collect include:

- name
- address
- bank account details
- gender
- phone number
- signature
- date of birth
- email address
- photograph, video image or picture of a person

In addition, we may collect information received as part of, or resulting from, a complaint made to BHC.

### ***Sensitive information***

Except as otherwise permitted by law, we only collect sensitive information about you if you have consented to the collection of the information (unless a relevant exception applies under applicable law) and if the sensitive information is reasonably necessary for the performance of our functions.

The kinds of sensitive information we collect may include information about your health status, racial or ethnic origin, criminal record or information which relates to the provision of housing and health services.

At BHC properties where facial recognition technology (**FRT**) is being used, we collect and hold biometric information and biometric templates gathered through BHC's Closed Circuit Television (**CCTV**) systems. For further information, see "**Video surveillance protocols**" and "**Biometric information collected using FRT**" below. BHC regularly reviews its FRT database to ensure that it is acting on accurate and up-to-date information.

### **Method of collection**

We may collect personal information directly from you using our standard BHC forms, over the internet, through our security camera footage, via email or through a telephone conversation with you.

### ***Third parties***

There may be some instances where personal information about you is collected indirectly from third parties because it is unreasonable or impractical to collect personal information directly from you (such as such as referring agencies, service providers, and law enforcement organisations) to enable service provision or to carry out a required activity.

Indirect collection of your personal information will only occur where you might reasonably expect it. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

### ***Video surveillance protocols***

Some BHC properties are equipped with CCTV systems. These devices are used to monitor safety and accessibility, as well as to deter (and capture evidence of) unlawful behaviour. Use of video surveillance equipment through our CCTV systems is accompanied by appropriate signage and is not used to monitor private areas (such as individual units within residential buildings).

### ***Biometric information collected using FRT***

At certain BHC properties where we have undertaken appropriate privacy impact assessments and have determined it is necessary to do so for a lawful purpose (for instance, where we have determined it is necessary for the prevention of serious threats to safety and for the security of our staff, tenants, residents, visitors and property), we collect biometric information using FRT as a feature of our CCTV systems, where that biometric information produces biometric templates.

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BHC acknowledges the potential for racial bias and will ensure that FRT is used lawfully and ethically, solely for identifying specific, known persons of interest (**POI**). FRT will not be used for general surveillance or profiling based on race, ethnicity or any other protected attribute.

### Purpose of collection

The personal information that we collect and hold about you, depends on your interaction with us. Generally, we collect, use and hold your personal information if it is reasonably necessary for or directly related to the performance of our functions and activities and for the purposes of:

- providing housing services to you or someone you know;
- facilitating internal business operations, including the fulfilment of our legal requirements;
- surveillance of BHC properties to ensure the safety of tenants, visitors, workers and other relevant stakeholders;
- responding to enquiries in relation to housing services;
- improving delivery of housing services; and
- promoting services that BHC provides (where we have your consent to do so).

### Internet users

If you access our website, we may collect additional personal information about you, including your IP address and domain name. Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to this Privacy Policy or our privacy procedures.

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor and analyse usage of our website so that we can serve you more effectively.

### Anonymity

Wherever reasonably practicable and lawful to do so, we allow individuals to engage with BHC on an anonymous basis.

### Failure to provide information

If you provide incomplete or inaccurate personal information, BHC may be unable to provide you or someone you know with the services you, or they, are seeking.

### Unsolicited information

Where BHC becomes the holder of unsolicited information, we assess that information in accordance with applicable law and if necessary, destroy or de-identify (as appropriate) that unsolicited information in a timely and appropriate manner.

## USE AND DISCLOSURE

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above).

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We may use and disclose personal information about you:

- to our related entities to facilitate our and their internal business processes;
- to third party service providers, who assist us in operating our business and providing services to you (including information technology service providers) and these service providers may not be required to comply with this Privacy Policy;
- to law enforcement or regulatory agencies when required by law; and
- for the purpose of undertaking statistical reporting.

### Offshore disclosure of your personal information

We use reasonable efforts to maintain all personal information in Australia, but it is possible that there are circumstances where we will disclose personal information overseas, such as for data storing purposes where our service provider has infrastructure overseas.

Where we disclose personal information overseas, we will only do so in accordance with the APPs by taking reasonable steps to ensure the information is kept secure and the overseas recipient complies with the APPs or is subject to a law or binding scheme which provides similar protection as the APPs.

### Direct marketing

We do not use your personal information for direct marketing, unless your personal information has been collected directly from you and you would reasonably expect it to be used for the purpose of direct marketing.

You can opt out of direct marketing communications at any time by using the 'unsubscribe' option available if the communication is by SMS or email or by contacting us (see "**Contacting Us**" below).

### Automated decision making

You will be informed if you are interacting with any advanced artificial intelligence (**AI**) tools or AI tools which operate autonomously without human intervention (like chatbots).

## INFORMATION MANAGEMENT, SECURITY, AND DELETION

### Security

We store your personal information in different ways, including in paper and in electronic form. The security of your personal information is important to us. We take all reasonable measures to ensure that your personal information is stored safely to protect it from interference, misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

We use a system of access controls as a security measure in relation to personal information and sensitive information as follows.

- Only authorised BHC workers with a relevant service responsibility are allowed to access personal information, which is not generally accessible by all BHC workers.
- Sensitive information is handled in a more limited manner. Access to the FRT system used by BHC in certain limited circumstances is restricted to authorised personnel based on their roles.

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### Deletion

BHC holds your personal information for as long as we need to provide you with our services.

Once personal information which has been provided to BHC is no longer required by to meet our obligations and perform our duties under relevant legislation and funding agreements, this personal information will be deidentified and destroyed in a timely and appropriate manner (provided it is lawful and reasonable to do so).

### ACCESS AND CORRECTION

You may access the personal information we hold about you, upon making a written request. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making the request for access).

We may decline a request for access to personal information in circumstances prescribed by the Privacy Act and if we do, we will give you a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint (see “**Complaints and feedback**” below).

If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint (see “**Complaints and feedback**” below).

### COMPLAINTS AND FEEDBACK

If you wish to make a complaint, please contact us using the details below and we will take reasonable steps to investigate the complaint and respond to you.

If after this process you are not satisfied with our response, you can submit a complaint to the Office of the Australian Information Commissioner (**OAIC**). To lodge a complaint, visit the ‘Complaints’ section of the Information Commissioner’s website, located at [www.oaic.gov.au/privacy/privacy-complaints](http://www.oaic.gov.au/privacy/privacy-complaints), to obtain the relevant complaint forms, or contact the OAIC office. For more information about privacy in general, you can visit the OAIC website at [www.oaic.gov.au](http://www.oaic.gov.au).

For matters involving personal information collected or handled under Queensland Government-funded programs, individuals may also contact the Office of the Information Commissioner Queensland (**OIC**). For further information, you can visit the OIC website at [www.oic.qld.gov.au](http://www.oic.qld.gov.au).

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### CONTACTING US

All queries or concerns about this Privacy Policy or the way BHC handles personal information are to be directed to the BHC Privacy Officer at:

Street address: Level 17, 333 Ann Street, Brisbane City, QLD, 4000

Post: GPO BOX 544, Brisbane QLD 4001

Email address: [feedback@bhcl.com.au](mailto:feedback@bhcl.com.au)

Telephone: (07) 3307 3000

Facsimile: (07) 3839 2000

Website: [bhcl.com.au](http://bhcl.com.au)

### REVIEW

This Privacy Policy and its related documents are reviewed periodically.

#### Document Change History

| Version Number | Approved by | Date       | Description of Change                                                           |
|----------------|-------------|------------|---------------------------------------------------------------------------------|
| 1.0            | Board       | April 2026 | New publication of BHC's Privacy Policy for customers, visitors and the public. |