

# RSI Privacy Policy

## 1. Introduction

Protecting your privacy is important to RSI Pty Ltd ('we'; 'us'). The following will help you understand how we collect, use, disclose, hold and safeguard your personal information.

### **Our main purpose**

We are an organisation which registers and inspects vehicles on behalf of the Secretary of the Department and Transport (DTP) as the person responsible for the State of Victoria's Roadworthy Scheme, and the information is, amongst other things, used for that purpose by the Secretary. The Secretary of the Department can be contacted on telephone (03) 9655 6666.

Personal information can come from people seeking to register vehicles, and to ascertain the roadworthiness of their vehicles. (Our Services)

## 2. Collection of personal information

### **What sort of personal information do we collect and hold?**

The personal information we collect and/or hold includes information set out in the Attachment.

### **Anonymity and Pseudonymity**

Wherever possible, we will give you the option of dealing with us anonymously or by pseudonym.

### **Why do we collect and hold personal information?**

If you wish to access or use our Services, it will be necessary for us to collect some personal information from you.

We only collect the information that we need to provide our Services, administer accounts, monitor our compliance with our obligations and satisfy our legal obligations. Obviously, the main consequence of not collecting this information is our inability to provide such Services.

### **How do we collect personal information?**

We collect information directly from people in various ways, including by via our inspectors' interactions with you or your representatives.

### **Unsolicited information and information from third parties**

In limited circumstances we may receive personal information which we have not specifically asked for. In these circumstances, we will determine whether it is necessary for us to retain that personal information.

If you provide us with information about another person, you must: ensure that you have their consent to do so; and tell them that you are disclosing their personal information to us and where they can obtain a copy of this privacy policy – see section 8.

### 3. How we use your personal information

#### **To provide you with the Services you want**

We use the information provided by you to provide our various Services, and to perform administrative functions such as receipting, billing, and handling complaints.

#### **To ensure the Secretary of the Department and Transport's Roadworthy Scheme functions properly**

We may need to use your personal information to answer any enquiry from the Secretary of the Department and Transport's or Safe Transport Victoria, providing them with registration and inspection information, and informing the Secretary of any data breaches or incidents, and associated complaints.

#### **To deal with your enquiries and complaints**

We may need to use your personal information to answer an enquiry or complaint a person makes in respect of our Services.

#### **To provide you with information about products and services which we believe may be of interest**

We may use your personal information to inform you about other products and services, discounts, special offers, competitions, and invitations to special events that we think might benefit you. Where we send you an offer relating to the products and services of other organisations, we keep control over the information. We do not give, rent or sell your personal information to other organisations so that they can direct market to our customers.

#### **To allow you to decline product offers ('Opt-Out')**

We recognise the importance of providing you with choices by giving them an easy means to 'Opt Out' from receiving marketing offers. Let us know if you do not want to receive these offers by contacting us on (03) 9646 3362.

#### **To obtain your feedback**

We may contact you from time to time in order to seek your opinion on how we do things and on matters relating to passenger transport, including road safety and other motoring related issues.

### 4. Who we disclose your personal information to

Unless we have told people otherwise at the time of collection or subsequently, or a legal exemption applies, we will only disclose your personal information to third parties:

- a) where it is relevant for the purpose and uses described above;
- b) where they are our contractors and business partners;
- c) as otherwise described below.

This includes:

#### **The Secretary of the Department and Transport or officers of Safe Transport Victoria**

We may disclose your personal information to the Secretary of the Department and Transport or officers of Safe Transport Victoria to ensure the proper operation of Victoria's roadworthy scheme.

#### **Third parties like claims processors, insurance providers, statutory investigators etc**

We may also disclose your personal information to a third party to assist us to deal with complaints, disputes or conflict arising from or as a consequence of your access to, or use of, the Services, and to enforce our rights, prevent unlawful activity.

## **Contractors**

We may contract with other parties to provide some of part of our Services on our behalf.

## **Business Partners**

In some cases, we work with other parties to seek to improve our Services or develop new or improved products or services.

## **Disclosing your personal information interstate and overseas**

We will not disclose information to entities located interstate and in countries outside Australia without your prior written consent, and, where the information relates to the roadworthy scheme, the Secretary of the Department's consent.

## **Sharing non-personal information**

We may share non personal, aggregate, or summary information about people with our business partners or other third parties.

## **5. Security of personal information**

We use technology, documented employee procedures and internal monitoring to help ensure that your personal information is protected and secure. We only allow access to those employees and contractors who need it to conduct their employment responsibilities. A Table setting out the personal information collected, recorded, and stored by RSI, and the relevant security measures for such information, is set out in Attachment.

Our employees and contractors are legally bound to keep your information confidential. The personal information that we hold electronically is protected through the use of encrypted passwords and storage on secure servers which are housed in controlled environments to protect against loss, misuse or alteration of your information.

### **How long do we keep information?**

We will keep your information for as long as it is necessary to continue to provide our Services or to service an account.

### **Our employees and training**

We provide training and communications programs designed to educate employees about the meaning and requirements of relevant privacy legislation and this privacy policy.

## **6. Information quality and your rights of access and correction**

### **Quality**

We use technology, documented employee procedures and internal monitoring to help ensure that personal information is accurate and kept up-to-date.

### **Access**

For security purposes, when you contact us to request access to your personal information, you will need to provide us with enough information to enable us to verify your identity. Depending on the nature of the request, we may ask you to complete a form and in some cases, as permitted by law, we may charge you a service fee for providing this information. Where we charge a fee, this will be to cover costs such as postage or materials involved in providing you with access to your information. We will inform you of any relevant charges at the time of your request. We will generally provide you with access to your personal information that we hold about you, but sometimes that will not be possible, in which case, we will give you a written notice explaining why.

## **Correction**

If you believe that any information we hold about you is inaccurate we ask that you contact us to let us know. You can contact us on (03) 9646 3362. We will take reasonable steps to correct your information, but if we don't correct your personal information we will give you a written explanation as to why.

## **7. How to complain about a possible breach of privacy**

If you believe that we have breached your privacy, or you have any questions in relation to this privacy policy you can contact us on (03) 9646 3362. We will promptly acknowledge your complaint, investigate it and determine the steps we will undertake to resolve your complaint within a reasonable time. We will contact you if we require any further information and will provide you with our determination once it is made.

## **8. Notification of data breaches and incidents**

A data breach occurs when personal information is lost or subjected to unauthorised access, modification, use or disclosure or other misuse. Data breaches can be caused or exacerbated by a variety of factors, affect different types of personal information, and give rise to a range of actual or potential harms to individuals, agencies and organisations.

All staff will follow the data breach response plan (response plan) set out in the BAV Human Resources Handbook applicable as at the date.

In addition, RSI General Manager must immediately notify the Secretary of DTP if the GM becomes aware that there has been, or suspects that there may have been, a data breach or data incident, and must provide the Secretary with all information of which he is aware about: a. the nature and circumstances (including time and place) of; and b. the person or persons responsible for – the data breach or data incident or suspected data breach or data incident.

The GM must also provide to the Secretary, in a manner and within the time reasonably specified by the Secretary: a. such further information about a data breach or data incident, or suspected data breach or data incident, as the Secretary requires; and b. all reasonable assistance requested by the Secretary to investigate, or mitigate the effects of, a data breach or data incident, or suspected data breach or data incident. Where the Secretary requires, the GM must notify a data breach or data incident, or suspected data breach or data incident to the Privacy Commissioner and such other persons that the Secretary directs and shall do so in accordance with the Secretary's reasonable directions (whether or not the GM is required to make the notification under a Privacy Law).

### **Data security practices and processes**

The GM will implement practices and processes to ensure compliance with this clause and under Privacy Law. The data and current protections are as set out in the attached document. Without limitation, such practices and processes: a. sufficiently identify and protect against risks of complete or partial loss, destruction or corruption, or unauthorised (whether malicious or accidental) access, disclosure, alteration or deletion, of scheme personal information; b. be consistent with good industry practice; and c. ensure that up-to date protection against viruses, malware and other threats to the security and integrity of scheme personal information are maintained.

The GM must immediately inform the Secretary if they become aware of any complaint concerning the RSI's handling of personal information relating to the Scheme and promptly comply with any reasonable directions of the Secretary in relation to: i. the handling, management or protection of personal information by the Licence Holder; ii. any actual or alleged interferences with privacy or breaches of Privacy Law in

relation to scheme personal information; iii. a complaint concerning the handling of scheme personal information; and iv. an investigation or the exercise of other functions by the Privacy Commissioner.

## 9. Availability and revisions of this privacy policy

We will ensure this privacy policy is available at <https://www.busvic.asn.au/road-safety-inspections-0>.

We may change this policy from time to time. If we do so, we will issue a notice via our website <https://www.busvic.asn.au/road-safety-inspections-0>. Please check for updates and changes.

## ATTACHMENT

### Personal Information - Inspection and Registration of Vehicles

<b>VEHICLE INSPECTIONS</b>			
<b>Personal Information</b>	<b>Recorded in</b>	<b>Stored</b>	<b>Security measures</b>
Presenter/Customer Name Presenter/Customer Address Presenter/Customer Licence No.  <b>(Bus, Truck and Car)</b>	Ticker Sheet	Kept in compactor in RSI's main building.	<u>After hours:</u> Locked. Key entry. Only GM/ two administrator officers in front office have key. Building has alarm system. <u>During work hours:</u> Access is monitored by administration assistants in the front office.
Presenter Name RSI Inspector Name  <b>(Bus, Truck and Car)</b>	Certificate of Roadworthiness - <b>Pass</b>	VicRoads eCertificate system  Attached to Ticker Sheet.	Information input directly into eCertificate system in real time. See security measures for Ticker Sheet.
Presenter Name Presenter Phone Number  <b>(Bus, Truck and Car)</b>	Certificate of Roadworthiness - <b>Fail</b>	VicRoads eCertificate system  Attached to Ticker Sheet.	Information input directly into eCertificate system in real time. See security measures for Ticker Sheet, which applies to both Certificate and attached Ticker Sheet.
<b>Individual</b> Presenter Name Presenter Address Presenter Phone Number RSI Inspector Name and Signature Company Phone No.  <b>Corporate</b> Presenter Name RSI Inspector Name and Signature Company Phone No.  (Bus only: Customers nominate a specific employee as the 'presenter' of vehicle for that customer – the name of the presenter, and a photograph of their licence are kept in a separate hard copy RSI folder. In these circumstances, it is the corporate name of the presenter, its address and corporate phone number that appears on the bus certificate of roadworthiness.)  <b>(Bus, Truck and Car)</b>	Certificate of Roadworthiness from VicRoads Roadworthy Book - <b>Pass</b>	Kept in compactor in RSI's main building.	See security measures for Ticker Sheet, which applies to both Certificate and attached Ticker Sheet.
<b>Individual</b> Presenter Name Presenter Address Presenter Phone Number	Certificate of Roadworthiness from VicRoads	Kept in compactor in RSI's main building.	See security measures for Ticker Sheet.

<p>Presenter Licence Number Presenter Signature RSI Inspector Name and Signature Company Phone No.</p> <p><b>Corporate</b> Presenter Name (RSI Inspector manually writes on Certificate; and 'On file' where Presenter's Licence is to go.) RSI Inspector Name and Signature Company Phone No.</p> <p>(Explanation above applies here too.)</p> <p><b>(Bus, Truck and Car)</b></p>	<p>Roadworthy Book - <b>Fail</b></p>		
<p><b>Individual</b> Presenter Name Presenter Address Presenter Phone Number RSI Inspector Name and Signature Company Phone No.</p> <p><b>Corporate</b> RSI Inspector Name and Signature Company Phone No.</p> <p>(Customers nominate a specific employee as the 'presenter' of vehicle for that customer – the name of the presenter, and a photograph of their licence are kept in a separate hard copy RSI folder. In these circumstances, it is the name of the corporate name of the customer, its address and corporate phone number that appears on the bus certificate of roadworthiness.)</p> <p><b>(Bus)</b></p>	<p>Bus Certificate of Roadworthiness - <b>Pass</b></p>	<p>RSI's IT system – Codeworthy – Webbrowser/App (Device)</p>	<p>See below.</p>
<p><b>Individual</b> Presenter Name Presenter Address Presenter Phone Number Presenter Licence Number Presenter Signature RSI Inspector Name and Signature</p> <p><b>Corporate</b> Presenter Name (RSI Inspector manually writes on Certificate; and 'On file' where Presenter's Licence is to go.)</p>	<p>Bus Certificate of Roadworthiness - <b>Fail</b></p>	<p>RSI's IT system – Codeworthy – Webbrowser/App (Device)</p>	<p>See below</p>

<p>RSI Inspector Name and Signature Company Phone No.</p> <p>(Explanation above applies here too.)</p> <p><b>(Bus)</b></p>			
<p>Customer's default name Presenter's Name Customer's Garage Address/Which is Possible Personal Address (e.g., sole trader) Customer's Corporate Address/Possible Personal Address (e.g., sole trader) Customer's Company Phone Number/Possible Personal Phone Number (e.g., sole trader)</p> <p><b>(Bus)</b></p>	<p>Bus Certificates of Roadworthiness</p>	<p>RSI's IT system – Codeworthy – Webbrowser</p>	<p>Edit access restricted to GM, 2IC and two administration officers. View access all inspectors.</p>
<p>Customer's default name Presenter's Name Customer's Garage Address/Which is Possible Personal Address (e.g., sole trader) Customer's Corporate Address/Possible Personal Address (e.g., sole trader) Customer's Company Phone Number/Possible Personal Phone Number (e.g., sole trader)</p> <p><b>(Bus)</b></p>	<p>Bus Certificates of Roadworthiness</p>	<p>RSI's IT system – Codeworthy – App (Device)</p>	<p>Inspectors access via android security pattern.</p> <p>At Port Melbourne: Locked in cupboard overnight – GM and administration officers have access with key. Off-site – Kept in vehicles overnight.</p>
<p>Photographs of Bus Certificate of Roadworthiness – which may include personal information set out above. Presenter Name Presenter Address Presenter Phone Number Presenter Licence Number</p> <p><b>(Bus)</b></p>	<p>Bus Certificates of Roadworthiness</p>	<p>RSI's IT system – Codeworthy – Sharepoint</p>	
<p>Photographs of Certificate of Roadworthiness and Bus Certificate of Roadworthiness (Bus, Truck, Car) – which may include personal information set out above. Presenter Name Presenter Address Presenter Phone Number Presenter Licence Number</p>	<p>Certificates of Roadworthiness</p>	<p>'I' Drive</p>	<p>Access restricted to GM, 2IC and two administration officers.</p>



<b>(Bus, Truck and Taxi)</b>			
Presenter's Name Customer Credit Card details except CVC No. Presenter's name RSI Inspector's Name	Specific RSI Form	Paperwork kept with Inspector	Regional testing: This information is provided to RSI's administration assistants by the RSI Inspector who collected it, used by the assistant to issue an invoice and obtain CVC directly from customer, then the Form is destroyed. Form kept in car/hotel room. Receipt created and affixed to invoice.
Presenter's Name Customer Credit Card details and CVC No.	In person	In person	Port Melbourne testing. RSI's administration assistants' complete transaction using EFTPOS.
<b>VEHICLE REGISTRATIONS</b>			
Presenter Name Presenter Address Presenter Phone Number Presenter Licence Number Presenter Signature	Dealer On-Line Authority to Register Form (printed out) Dealer Vehicle Registration Form  Ad-hoc Authority to Act on behalf of Registrant Form.	Cupboards in RSI main facility.	RSI Building locked overnight; alarm system.