

## CDC Data Centres Privacy Policy

### Canberra Data Centres (CDC) and the Australian Privacy Act

This Privacy Policy (“the Privacy Policy”) outlines the way in which CDC Data Centres Pty Ltd and its related entities (“CDC” or “the CDC Group”) collects, holds, uses and discloses personal information.

CDC follows the Australian Privacy Principles (“APPs”) guidelines issued by the Office of the Australian Information Commissioner (OAIC). The APPs set out how CDC should collect, use, secure, or disclose personal information and how to access these records containing personal information.

By using CDC’s websites, applications and services, or otherwise providing CDC with your information, you consent to CDC collecting, holding, using and disclosing your personal information as described in this Privacy Policy.

In this Privacy Policy, personal information has the meaning given it in the Privacy Act 1988 (“the Privacy Act”), and includes information or an opinion, whether true or not, about an identified individual or an individual who is reasonably identifiable.

### CDC Website

CDC does not collect your identifiable personal information when you are browsing the CDC website to read or download information.

A visit to the CDC website to read or download information, may result in the recording, through our web server log files the following non-personal information for statistical purposes:

- Your server address
- Account top level domain name (e.g. .gov, .com, .edu, .org, .au, .nz etc)
- Pages accessed and the documents downloaded
- Search terms used
- Date and time visited the site
- Previous site visited
- Computer operating system (e.g. Windows, Linux, Mac OS)
- Type of browser used (e.g. Internet Explorer).

This data helps CDC manage the website efficiently and securely, including monitoring to prevent security breaches and to enhance the website to user needs. No attempt is made to identify visitors’ browsing activities, except in the unlikely event of a criminal investigation, e.g. where a law enforcement agency may exercise a warrant to inspect CDC’s Internet Service Provider’s (ISP) logs.

If you send a message to CDC through the web contact page CDC only records or uses the personal information to respond to the request or provide the requested service. Email addresses collected in this way will not be added to a mailing list or used for any other purpose.

If CDC wishes to use email addresses for another purpose we will seek prior consent by way of a specific request in writing.

## **Cookies**

Cookies are pieces of information that a website can transfer to a visitor's web browser. Parts of CDC's website may store cookies on browsers in order to provide a better service on the next visit to the site.

Web browser's settings can be changed to reject cookies or to prompt each time a website wishes to add a cookie to the browser. Some functionality on the website may be affected by this.

CDC's website from time to time may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

For more information about cookies and instructions on how to adjust browser settings to restrict or disable cookies, see the Office of the Australian Information Commissioner's Privacy Fact Sheet 4.

## **Information Security**

CDC maintains the same level of security for personal information collected electronically as for personal information collected on paper. However, if you are providing personal information via an email or an online form, be aware that there are some risks to transmitting data via the Internet.

## **External Web Links**

CDC's web site may contain links to other web sites. CDC is not responsible for the content and the privacy practices of other web sites and encourages you to examine each web site's privacy policy and make your own decisions regarding the accuracy, reliability and correctness of material and information found.

## **How Personal Information is Collected and Maintained**

CDC collects personal information only where it is reasonably necessary for, or directly related to, CDC's functions or activities, or if collecting sensitive information, if the person concerned expressly consents to the collection.

CDC will generally collect personal information directly from you when you provide your details to us. CDC may also collect your personal information indirectly through emails, forms, online queries, the use of our website and telephone conversations.

When personal information is received that was not ask for, it is handled as if the information was requested.

## **Types of Information Collected**

The types of information that CDC may request may include the following;

- Your details on a customer purchase order
- E-mail notification for example: your order status, your web account number, our technical response to your problem
- Your contact for a mailing list
- Our response to your request for a quotation
- Your customer satisfaction level
- Your acceptance to receive information from a sales person
- Confirmation that you will attend a CDC business related conference or seminar

In the case of newsletters or mailing lists, you can “unsubscribe” to these mailings at any time:

1. By emailing simply the words REMOVE on the subject field, your company name and contact details and we will remove your details from our database –  
Email [contact@cdcdc.com.au](mailto:contact@cdcdc.com.au)
2. By calling Sales on 1300 232 232

### **CDC will use your personal information for specific purposes**

CDC will only use your information to support your interaction with CDC. CDC staff who access your information under normal business procedures have been advised that they must protect your data and privacy in accordance with this Privacy Policy.

In circumstances where CDC collects sensitive information from you, you consent to us using and disclosing that information in connection with your consent or where it is reasonably necessary for us to use and disclose this information for CDC’s functions or activities.

### **Anonymity**

You have the option of dealing with CDC without revealing your identity. You may remain anonymous or use a pseudonym, unless CDC is required or authorised by law to deal only with an identified person, or it is impracticable for CDC to respond without you being identified, e.g. to provide you with feedback.

If a pseudonym is used, CDC will not link other personal information to the pseudonym unless required or authorised by law, it is impracticable for CDC to act differently, or you have consented to a link. Access to any personal information that may be linked to a pseudonym is restricted to authorised staff.

### **Transborder Dataflows**

CDC may disclose your personal information to other members of the CDC Group including those members located in New Zealand.

Otherwise, CDC will not disclose your personal information to overseas recipients unless we are required or authorised by law to do so.

### **Data Quality**

CDC will endeavour to collect and use personal information that is accurate, complete and up to date. CDC will take reasonable steps to confirm the quality of personal information before it is used or disclosed.

### **Data Security**

CDC stores the personal information it collects in different ways including in paper and in electronic form.

CDC uses a range of physical and electronic systems to store the personal information and takes all reasonable steps to secure the information from misuse, interference and loss, unauthorised access, modification or disclosure.

These measures include but are not limited to:

- Restricted physical access to our offices

- Secure cupboards and storage containers for paper records
- Secure computer systems and networks for electronic records
- Controlled access to databases by authorisation, training and passwords
- Workplace policies
- Regular review and testing of our physical and electronic systems.

CDC offices have ISO/IEC 27001:2013 Information Security Management System certification.

CDC will keep the personal information it collects as long as is necessary relating to the purpose for which it is collected, used and/or disclosed. CDC will then take reasonable steps to destroy and/or de-identify the personal information, unless it is required to be retained by law.

### **Access and Correction**

Under the Privacy Act, Australian Privacy Principle 12 (APP 12) allows a request to access personal information. Australian Privacy Principle 13 (APP 13) allows a request to correct personal information if believed that the information is incomplete, inaccurate, out of date, misleading, or irrelevant.

Under the Privacy Act, requests can be in writing, including by email, or by telephone. CDC will require you to verify your identity and specify what information you require. Requests can be sent to CDC via:

Email: contact@cdcdc.com.au

Post: Privacy Contact Officer

PO Box 635

Fyshwick, ACT 2609

Telephone:1300 232 232

### **Data Breach Notification:**

If there are circumstances where CDC experiences an eligible data breach as defined by the Privacy Act, CDC will make the required notification in accordance with the Act.

### **Opting Out:**

If you no longer wish to receive communications from CDC please contact us utilising the contract enquiry form within our website. CDC may seek clarification as to the types of communications you wish to be opted out from.

### **Further Information:**

If you require further information in relation to privacy in general you can visit the Office of the Information Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au).

## Appendix 1- New Zealand Addendum

CDC Data Centres NZ Ltd and other members of the CDC Group which carry on business in New Zealand (“**CDC NZ**”) comply with the New Zealand *Privacy Act 2020* (“**the NZ Privacy Act**”) and have adopted the Information Privacy Principles (“**IPPs**”) contained in the NZ Privacy Act. This Schedule contains the additional specific provisions which apply to CDC NZ and any other member of the CDC Group which carries on business in New Zealand.

### **Disclosure of Personal Information to Overseas Recipients**

CDC NZ may disclose your personal information to other members of the CDC Group located outside of NZ. CDC NZ takes reasonable steps to ensure that the overseas recipients of your personal information are bound by substantially similar or comparable standards as to those which apply under the NZ Privacy Act.

### **Rights under the NZ Privacy Act**

In accordance with the NZ Privacy Act, under certain circumstances you have the right to:

- A. request your personal information
- B. request Correction of your personal information

If you exercise one of the above rights, CDC NZ may need to request specific information from you to help it confirm that you are entitled to make such a request. This is to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Privacy Statement Enquiries and Complaints**

CDC NZ has appointed a privacy officer to oversee compliance with the NZ Privacy Act and this Policy. If you want to exercise any of your rights under the NZ Privacy Act or if you have any queries or complaints about this Policy or how CDC handles your personal information please contact the CDC Privacy Contact Officer either email or telephone:

Email: [contact@cdcdc.com.au](mailto:contact@cdcdc.com.au)

Telephone: +64 21 562 120 and ask for the Privacy Contact Officer

There is an option to contact us without identifying yourself or of using a pseudonym. Further information on dealing with us anonymously or by using a pseudonym is in our Privacy Policy above.

## Appendix 2 – COVID-19 Vaccination Evidence – Collection Notice

### 1. BACKGROUND

As part of CDC's COVID-19 Vaccination Policy (the Vaccination Policy), CDC must collect and/or sight evidence that an individual entering a CDC premises (including CDC employees) (Applicable Person(s)) has up-to-date vaccinations of a Government approved COVID-19 vaccine or evidence of a medical contraindication precluding a person from receiving an approved COVID-19 vaccine (together, Vaccination Information). As the Vaccination Information constitutes sensitive information of an Applicable Person, CDC will ensure that it obtains consent from the Applicable Person at the time of collection as required under the Privacy Act 1988 (Cth).

An Applicable Person, (except those persons who are granted an exemption under the Vaccination Policy) who does not provide evidence of vaccination, will be prevented from accessing CDC's Premises. In addition, if an Applicable Person does not consent to collection of Vaccination Information by CDC, then that individual will be treated as not being vaccinated and will be considered non-compliant with the Vaccination Policy.

The purpose of the collection and use of Vaccination Information is for CDC to:

- a) where applicable, comply with any relevant COVID-19 vaccination requirements issued by an Australian Federal or State government;
- b) manage and prevent the risk of contraction and spread of COVID-19 in CDC's premises or while workers of CDC are undertaking work (including travel related to work); and
- c) assess access of persons to CDC premises to manage the risks of potential exposure to COVID-19 in respect of its workers or other persons whose safety may be put at risk.

### 2. USE AND DISCLOSURE OF PERSONAL INFORMATION

CDC may use and disclose Vaccination Information for the following purposes:

- a) to owners and occupiers of CDC's premises, Federal or State governments as required by law, and (only to the extent required) in order to comply with its contractual obligations to third parties;
- b) for the purposes described in paragraph 1 above, or for a secondary purpose where the use or disclosure is required or authorised under an Australian law or where a permitted general situation applies, such as if it is unreasonable or impracticable to obtain a person's further consent, and it is necessary to use or disclose the information to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety; or
- c) for informing staff that a colleague or visitor has or may have contracted COVID-19 but personal information will only be used or disclosed in a manner that is reasonably necessary in order to prevent or manage COVID-19 in the workplace (including in CDC's premises).

CDC will ensure that any access to Vaccination Information used or disclosed for any of the above circumstances will be on a strict, 'need to know' basis.

### **3. SECURITY OF PERSONAL INFORMATION**

The security, integrity, and confidentiality of personal information is extremely important to CDC and CDC has implemented appropriate technical, administrative, organisational, and physical security measures that are designed to protect personal information from unauthorised access, disclosure, use, and modification.

CDC regularly reviews its security procedures to consider appropriate new technology and methods. Please be aware that, despite CDC's best efforts, no security measures are perfect or impenetrable. CDC will take reasonable steps to protect an Applicable Person's Vaccination Evidence information by ensuring it is stored securely, kept only for as long as required for an applicable purpose and disposed of appropriately in accordance with this Privacy Policy.

### **4. ACCESS AND CORRECTION; COMPLAINTS**

CDC's privacy policy (to which this collection notice is attached) sets out the rights that an individual has to access or correct their personal information, including Vaccination Information. The privacy policy also sets out details on how an individual may request further information or make a complaint about their handling of personal information.