



# PRIVACY POLICY

## SUMMARY

### Privacy Policy

Summary description of Policy This policy applies to personal and sensitive information (as defined in s 6(1) of the Privacy Act) collected by the National Gallery and sets out how we handle and maintain your personal information in compliance with the Privacy Act and the Australian Privacy Principles. This includes how we collect, store, use, disclose, quality assure and secure personal information, as well as your rights to access or correct your personal information.

Policy Status  New Policy  
 Revision of Existing Policy

Approval Authority Council

Policy Steward Head of Governance

Contact area Governance

## APPROVALS

Position	Name	Endorsed/Approved	Date
COO	Alison Halpin	Yes, Endorsed	19 May 2023
Director	Dr Nick Mitzevich	Yes, Endorsed	22 May 2023
Council	Ryan Stokes	Yes, Approved	2 June 2023
Council	Ryan Stokes	Yes, Approved	2 August 2024

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# 1. PURPOSE

The *Privacy Act 1988* (Cth) (the Privacy Act) requires entities bound by the Australian Privacy Principles (APPs) to have a privacy policy.

The National Gallery of Australia (National Gallery, we or us), as an Australian Government agency, has a number of legal obligations under the Privacy Act in respect of collecting and handling *personal information*, and *sensitive information* particularly as set out in the APPs (found in Schedule 1 of that Act and at Annexure 1).<sup>1</sup> The National Gallery additionally has obligations under the Privacy (Australian Government Agencies – Governance) APP Code 2017 (the Code).

This Privacy Policy outlines the personal information handling practices of the National Gallery consistent with those obligations.

This Privacy Policy is written in simple language. Where we say ‘you’ or ‘your’ we are broadly referring to all individuals that interact with the National Gallery in various capacities, for example members of the public, artists, National Gallery employees and/ or contractors.

# 2. POLICY STATEMENT

This policy applies to personal information collected by the National Gallery and sets out how the National Gallery uses and discloses and holds personal information to exercise its power and perform its functions under the *National Gallery Act 1975* (Cth) (the Act).

This policy does not apply to personal information contained in the national collection material that is held, managed and made accessible by the National Gallery. The Privacy Act includes a general exemption for all such material held by libraries, art galleries and museums.

# 3. COLLECTION OF YOUR INFORMATION

## 3.1. TYPES OF PERSONAL INFORMATION WE COLLECT

The kind of personal information the National Gallery collects and holds about you will depend on the nature of your dealing with us. The National Gallery may collect and hold the following types of personal information:

- name, contact information (including email address, postal address and phone numbers) and date of birth
- personnel and employment records
- personnel records (including for contractors or service providers)
- financial information and accounting systems records (including creditors’ and debtors’ names, addresses, contact information and bank account details)
- records about council members, National Gallery Members and volunteers
- financial donations and sponsorship information including the name of the person making the donation and the date and amount received
- provenance information associated with art in the national collection
- information about donors or sellers of works of art to the national collection or people who loan works of art to us for an exhibition
- copyright/ rights and permissions information associated with the use of an artwork or images
- information about journalists and media organisations
- information about artists, gallerists, brokers or agents who engage with the National Gallery
- CCTV footage and other security information (such as use of access passes)
- information on certifications, licenses, accredited training records, and other, compliance

<sup>1</sup> Personal information and sensitive information is currently defined under section 6(1) of the Privacy Act.

related documents

- information in regard to school groups that visit or participate in a National Gallery activity
- filming and photography related to a National Gallery activity, and
- photography and filming release information (including parental or guardian consent where the footage or image includes children).

### 3.2. HOW WE COLLECT PERSONAL INFORMATION

The National Gallery may collect information directly from you, or from a third party including when you:

- submit a job application
- become an employee and during your period of employment with us
- make a donation
- book an event or a ticket to the National Gallery or an exhibition
- subscribe to our marketing or promotional activities
- become a National Gallery Member or make a membership payment
- engage with us in person, over the telephone, on social media or using other electronic or paper correspondence
- submit an online form, enter a competition, provide feedback, participate in a survey or make a complaint
- make a request under applicable commonwealth legislation, for example the *Freedom of Information Act 1982* (Cth)
- become a contractor or service provider engaged by us
- enter into a partnership or loan agreement with us
- enter into a supplier contract, or funding agreement with us, or if you are an approved subcontractor or otherwise employed or engaged by one of our suppliers
- are party to a health and safety incident report (where practical with your consent)
- sell or lend a work of art to us, exhibit your work at the National Gallery, if we commission a work of art, or lend a work of art to you, or  
submit an image reproduction or copyright request related to work in the national collection.

## 4. SENSITIVE INFORMATION

There is a distinction in the Privacy Act between *personal information* and *sensitive information*. The National Gallery will not collect personal or sensitive information which it does not need. The National Gallery may collect sensitive information about you such as your racial or ethnic origin (for example whether you are a first nations artist) or health information (for example, if you tell us you need mobility support when you visit the National Gallery or let us know you have allergies before attending a catered function).

The National Gallery may collect sensitive information about its employees. For example, employees may formally identify as a person from a culturally or linguistically diverse background, belong to a union or have a disability. Health information (for example medical reports or certificates) may also be collected by the National Gallery where there is a workers' compensation or other health-related matter affecting an employee.

If a National Gallery employee's and/or volunteer's role requires a Working with Vulnerable People (WWVP) check the National Gallery will request and collect a copy of their current WWVP check where relevant and/or required by an employee or volunteer's role.

National criminal history checks are conducted on prospective staff members, volunteers, interns, visiting researchers, contractors and approved subcontractors. The National Gallery will seek your consent before. Access to relevant personal information is strictly limited to authorised National Gallery staff and managed in accordance with the Protective Security Policy Framework (PSPF) and the National Gallery's Protective Security Policy (PSP).

Sometimes the National Gallery will also need to collect sensitive information about you to, for example, handle a complaint. We will only collect, use and disclose sensitive information for the purpose for which it was collected unless we have obtained your consent, or we are authorised or required to do so by law.

## 5. PURPOSES OF COLLECTION, USE AND DISCLOSURE

The National Gallery collects, uses and discloses personal information to meet the objectives of, and fulfil its functions under the Act. Some of these powers and functions include:

- developing and maintaining a national collection of works of art
- exhibiting, or making available for exhibition by others, works of art from the national collection or works of art that are otherwise in the possession of the National Gallery, and
- using every endeavour to make the most advantageous use of the national collection in the national interest.

The National Gallery will not collect, use or disclose personal information unless the information is deemed reasonably necessary for, or directly related to, one or more of the National Gallery's functions or activities under the Act or as otherwise required by law.

These purposes include to:

- provide public access to items in the collection
- process bookings and ensure events or visits are properly coordinated
- respond to enquiries, complaints or feedback
- provide visitor support
- engage with the public via a digital activity, a social media platform or an online service, including direct marketing (for example, by phone, mail, email, social media and online advertising).
- engage with media organisations, including journalists to proactively engage with them in regards to upcoming media events
- provide or facilitate public events and activities
- assist in and facilitate research into the visual arts and the national collection
- improve services offered by the National Gallery
- assess applications for employment
- manage personnel (including to provide payroll, human resources, security clearances, and other related services)
- manage work health and safety related issues
- conduct stakeholder liaison including members and donors, image sales and rights and permission management
- maintain the physical and Information Technology security of the National Gallery and protect the national collection
- identify and inform you about programs, exhibitions and events that may be of interest to you (where you have not opted out to receiving these communications),
- to issue information about an exhibition or event you have booked or registered to participate in (i.e. updates that you need to be aware of in relation to your attendance of an exhibition or event , even if you have opted out to receiving general promotional communications) and,
- perform internal and administrative activities such as planning, auditing, data analysis, internal benchmarking, reporting, procedural assessments, risk management, safety management, business continuity and disaster recovery, quality control, staff training, research, accounting and billing.

Where the National Gallery has collected your information for a specific purpose, we will not use or disclose your personal information for another purpose, unless you have given your consent, we have told you about

this secondary purpose at the time we collected your information, or the use is permitted under the Privacy Act or otherwise authorised or required by law.

## **6. ANONYMITY AND PSEUDONYMITY**

Wherever possible the National Gallery will provide the opportunity for you to deal with us anonymously or pseudonymously. In some instances, if you do not wish to provide personal information, or the information you provide is incorrect, we may not be able to consider your application for employment, respond to your request, suggestion or complaint or send you invitations to events and exhibitions you may be interested in.

In some instances, it may be impractical to deal with a person anonymously if their email address contains their name, or if their name is required to RSVP for an event or to claim tickets to exhibitions.

## **7. PERSONAL INFORMATION AND CHILDREN**

The National Gallery may collect personal information about children such as their name, age, contact details and other relevant information when they enter a competition, attend the National Gallery as part of a school group, learning activity or feature in video or photographic footage of the National Gallery.

In the interests of ensuring the maximum level of privacy protection for children, we will not knowingly collect, use or disclose personal information about children without obtaining the prior consent of a parent or guardian. The National Gallery will not use personal information about children for any secondary purposes unless required or authorised by law.

## **8. HISTORICAL COLLECTION, EXHIBITION AND RESEARCH**

The National Gallery collects personal information relating to artwork in the national collections and on loan to the National Gallery. This information includes details about the history of the art, including its current and previous owners and other people connected with that artwork. The purpose of collecting this information is to assess an artwork's ownership and provenance prior to acquisition or loan. This is important to establish the legitimacy and confidence in the national collection.

Personal information about an artwork is obtained from a range of sources including from the donor or vendor and from historical records. The nature of this research is such that personal information is not always collected directly from the person to whom the information relates but from other sources such as third party oral or written histories or newspaper or magazine articles.

Personal information may also be collected in the course of historical research conducted by the National Gallery and for the purposes of exhibition. This information may not necessarily relate to an object in the national collection. This information may be maintained in a range of forms such as writing, video or sound recordings or photographs.

The National Gallery may collect, use or disclose limited personal information of this kind for the following purposes:

- to facilitate the management (for example transportation and insurance) of the artwork
- to arrange physical access to the collection by researchers, special interest groups or the media
- to respond to enquiries for information about the collection or the National Gallery's
- activities received from members of the public, members of parliament or other interested third parties.

The National Gallery also makes provenance and creator information publicly available on its website and in its annual report to further establish the legitimacy, confidence and credibility of the national collection and the National Gallery.

## 9. NATIONAL GALLERY HUMAN RESOURCES INFORMATION

The National Gallery stores personal information collected or created for human resources purposes (human resources information,) including:

- job application information
- information about staff
- pay, Superannuation and tax information, and
- diversity information including age, sexual orientation, ethnicity, employment information.

The National Gallery uses Aurion Corporation (Aurion) for the provision of recruitment, employee onboarding, Employee Self-Service (ESS), payroll services and general human resources information. All data is stored on premises or via the cloud, hosted on Amazon Web Services (AWS) in Australia. The National Gallery retains ownership of all the rights, title and interest in the data that Aurion stores.

### 9.1. WORK HEALTH AND SAFETY (WH&S)

The National Gallery uses and discloses personal information in a range of ways, primarily via an online WH&S management system. If you are a National Gallery employee, personal and sensitive information will be accessible by your manager and the human resources team but will only be disclosed in accordance with the Privacy Act.

The National Gallery may also disclose human resources information for the purpose of conducting investigations, facilitating rehabilitation activities or for the purpose of worker's compensation (i.e. to Comcare or a third-party rehabilitation provider).

### 9.2. CONTRACTOR INFORMATION

The National Gallery also uses an online contractor management system. All contractors that attend on-site may be asked to provide the following information:

- email address
- telephone number
- address
- Australian Business Number
- number of years operating as a business
- worker's compensation insurance certificate of currency
- public liability/ professional indemnity insurance certificates, and
- website information (**Contractor Information**).

Contractor Information will be input by the staff member who is engaging the contractor (the contract manager), who enters the Contractor Information into the online contractor management system.

## 10. NATIONAL GALLERY INFORMATION & DATA MANAGEMENT POLICY

The National Gallery's *Information & Data Management Policy* outlines the way in which employee and contractor information and National Gallery information and date is managed by all employees in accordance with the Privacy Act and the *Building Trust in the Public Record Policy*.

Any information staff or contractors create, use or review on National Gallery software or hardware can be monitored or accessed if required by the National Gallery, when done in accordance with the Privacy Act.

All information created and used by employees at the National Gallery are managed in line with legislation including retention, disposal and access.



# NATIONAL GALLERY VISITOR AND SUPPORTER INFORMATION

The National Gallery maintains a database with contact details of individuals who regularly engage with us or who wish to receive information about particular events, exhibitions or activities at the National Gallery (Promotional Information). This includes members of the general public, donors, National Gallery Members or people with a business-related interest in the National Gallery. We would usually collect this information directly from you if you are interested in receiving the Promotional Information or if you are a representative of an interested organisation.

Personal information in the customer relationship database is used to:

- distribute Promotional Information or information about membership, at the National Gallery, including by post or direct marketing – email, social media, mail, online advertising, SMS or telephone
- maintain membership lists, including managing membership renew information, membership benefits, and manage members communication preferences.
- maintain donor information and (with their consent) to publicly acknowledge these donors
- administer a booking for an event, exhibition or function
- request and receive feedback about visitor experiences
- manage auto billing where National Gallery Members have selected that option, and
- generate invitation lists for National Gallery events or activities.

## 11. COLLECTION THROUGH THE NATIONAL GALLERY'S WEBSITE

### 11.1. COOKIES AND GENERAL WEBSITE TRAFFIC

The National Gallery's website (including [nga.gov.au](http://nga.gov.au) and [connect.nga.gov.au](http://connect.nga.gov.au)) uses cookies for the purpose of collecting statistical data. A cookie is a small data file that is placed on your computer by a webpage server for record keeping purposes and to enhance functionality on the website. Cookies cannot be used to run programs, deliver viruses, extract or collect any personal information from your computer or provide any way for us to contact you.

Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before using our website.

The National Gallery automatically collects general website traffic information (e.g. visitors and page view numbers) to assist us to provide improved services.

When you visit a National Gallery website the National Gallery makes a record of your visit for statistical and marketing purposes so as to evaluate visitor usage patterns. Information recorded or logged includes:

- your server or hostname of the IP address
- the address of the referring site
- the date and time and session lengths of your visit
- your top level domain name (eg: .gov/.org/.nz etc), and
- addresses of pages accessed and documents downloaded

### 11.2. ADDITIONAL COOKIES – DISTRIBUTION LISTS

If you subscribe to our distribution list to receive our promotional activities ( as outlined below at 17.1) and you access the National Gallery's website via a link provided in that promotional activity (i.e. a National Gallery email), the National Gallery's customer relationship database will place an additional cookie which logs and reports statistical data of your activity on the website connected with your account.

If you have not accessed the National Gallery website in this way the National Gallery does not record your website activities as listed above.

### **11.3. GOOGLE GA4**

Our website uses Google GA4, a service which transmits website traffic data to Google servers in the United States. We use Google GA4 to understand how users engage with our website. Data transmitted includes, for example, the web address of the page that you are visiting and your IP address. Google may also set cookies on your browser or read cookies that are already there. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

More information about how Google GA4 collects, and processes data is described in Google's Privacy Policy.<sup>2</sup> If you don't want Google GA4 to be used in your browser, you can use the opt-out service provided by Google or the 'incognito' mode in your browser.

## **12. SOCIAL NETWORKING SERVICES**

The National Gallery uses social networking services such as Instagram, Twitter, Facebook, LinkedIn, Tik Tok and YouTube to communicate to the public and potential employees. When you communicate with the National Gallery using these services, we may collect your personal information, but will only use it to help us to respond or communicate with you and the public. The social networking service will also handle your personal information in accordance with its own privacy policies. Please keep in mind that if you directly disclose personal information on social media, this information potentially becomes public and may be collected and used by others.

## **13. WHEN YOU VISIT THE NATIONAL GALLERY**

The National Gallery uses Wi-Fi-based technologies that may collect information (such as which parts of the National Gallery are visited) from Wi-Fi enabled devices. We use this technology to better understand visitor behaviour and traffic patterns throughout the National Gallery so we can improve the safety, security, and overall experience of visitors to the National Gallery. This information is collected automatically, however the information will be anonymous and will not include, or be linked to, any personal information about you unless you give permission for this to occur. To opt out, simply turn off Wi-Fi on your device.

The National Gallery may record, photograph or film events and public programs held at the National Gallery for promotional, publicity, research or archival purposes. We will endeavour to provide notice of any events where filming is being conducted. If you attend an event, you may appear in the background of the images or footage unless you tell us that you do not want to be filmed. We will always seek permission from you before filming you up close or before filming children under 18 years of age.

## **14. SECURITY RECORDS (INCLUDING IMAGES & CCTV)**

We maintain security records in order to manage access to National Gallery premises, assets and information. These records relate to National Gallery staff, volunteers, interns, visiting researchers and contractors, and includes access passes, national criminal history checks and national security clearances. Identification photos are used for security and access control purposes. Access Control records also provide a way via which staff/contractor movements can be tracked and monitored. We rely on these records for a variety of reasons, but primarily will be pulled and utilised for investigative purposes. Access and usage reports via our electronic key management systems are integrated with our Access Control System and also provide capability to track/monitor usage as applicable to an individual user. The National Gallery's Security team is responsible for the management of these records in accordance with the PSPF and PSP.

The National Gallery uses closed circuit television (CCTV) systems to monitor and record activity in a range of publicly accessible locations at the National Gallery. The purpose of this monitoring is to provide a safe and secure environment for National Gallery staff and visitors and to protect the National Gallery's collection and exhibits from damage, theft or loss.

<sup>2</sup> As of July 2024, see - [Privacy Policy – Privacy & Terms – Google](#).

The images recorded by the cameras may include identifiable images of people visiting the National Gallery. These images are stored in a secure environment, and access to these recordings is limited to authorised staff only.

#### **14.1. WH&S INCIDENTS**

The National Gallery also records information about incidents, hazards and near misses (**Incidents**) at the National Gallery's premises in a range of ways, primarily recorded via our online WH&S management system. The National Gallery may include photographs or CCTV footage as part of recording/logging Incidents. These photographs and videos are intended to provide evidence of, or context to, an Incident. The capture of any facial or other images of third parties is incidental to this.

If you are specifically requested to provide an Incident report, you will be asked by a National Gallery employee for information regarding that Incident. This information will be accessible to a limited number of authorised staff and will only be disclosed in accordance with the Privacy Act. When reporting an Incident, you may opt to report it anonymously.

Where an Incident has occurred warranting further investigation, the National Gallery may allow the recording or Incident reports to be viewed by people responsible for investigating the incident, both within the National Gallery and/or external investigative bodies or law enforcement agencies (such as the Australian Federal Police).

## **15. THE NATIONAL GALLERY SHOP (ART STORE)**

The National Gallery uses a secure electronic facility to process all credit card transactions. Customers may also leave their details at the Art Store in order to purchase items by mail order or to have items placed on hold.

Personal information is collected for the purposes of fulfilling the order and, if the purchaser has asked to receive newsletters or other information about the National Gallery, to provide them with that information. Personal information may be disclosed to Australia Post for the purposes of delivering an order. The National Gallery also retains order details (excluding credit card details) in a secure system to help manage any returns, refunds or exchanges.

## **16. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION**

The National Gallery will take reasonable steps to correct personal information it collects and holds to ensure that it is accurate, up-to-date, complete and relevant and not misleading.

You may request access to, or seek correction of, any personal information held about you under the Privacy Act and the APPs. If you would like to access or correct any personal information we hold about you, you can contact the Privacy Officer. The National Gallery will respond to any request within 30 days and will take reasonable steps to provide access in a way that meets your needs.

If the National Gallery makes a decision not to grant your request for access, or we disagree about the accuracy of the information and are unlikely to change it, we will provide a written response listing the reason for refusal and how you can complain about our decision.

## **17. DISCLOSURE OF PERSONAL INFORMATION**

The National Gallery may disclose your information to third parties (such as our insurers) or other government departments where required to fulfill our functions under the Act, where you provide your consent, if required to comply with regulatory or reporting obligations, or where required or authorised by law. We take reasonable steps to ensure that, before disclosing personal information to any third party, they

comply with the requirements of the Privacy Act and the APPs.

The National Gallery is committed to demonstrating the legitimacy of works of art in the national collection by ensuring that all acquisitions are negotiated and managed on terms that are ethical and transparent to public scrutiny. To this end, we may publish information in our annual report about all acquisitions approved in the financial year, including the seller's name, the purchase price of the works and any provenance information.

We may also publish information in our annual report to recognise and acknowledge the philanthropic support received from our generous donors over the financial year (with their consent). We will also publish remuneration information about the Director, and members of Council and the Audit and Risk Committee, in accordance with our legislative requirements.

We sometimes engage other entities to perform services for us such as engaging a provider to conduct a survey or other research on our behalf. We may share your personal information with them or receive personal information about you from them. These third parties are engaged in accordance with our obligations under the Privacy Act and they have agreed to hold this information in confidence, not use it for any other purpose except to carry out the requested services and honour our privacy and security policies in the way personal information is handled.

### **17.1. ELECTRONIC MARKETING & ELECTRONIC DISTRIBUTION LISTS**

The National Gallery uses Prospect 2, an online marketing automation platform and service provider, to send and manage emails and events. In using this service, Prospect 2 may collect personal information about you such as email addresses and other information to be used for the distribution of email campaigns and other important information.

Prospect 2 maintains your data in compliance with Australia's *Spam Act 2003* (Cth) and the APPs. If subscribers request to 'opt-out' the National Gallery will, within a reasonable period (no more than 30 days) stop facilitating direct marketing. All data is hosted on Amazon Web services (AWS) in Australia. The National Gallery retains ownership of all the rights, title and interest in the data that Prospect 2 stores. Where stipulated, data is encrypted in transit using TLS connections and all data stored via Prospect 2 is encrypted at rest. If you would like to contact Prospect 2 you can find contact details on their website.

## **18. DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS**

From time to time, the National Gallery may disclose personal information to overseas recipients for:

- interlibrary loan and document delivery
- the exchange of library collection metadata records
- loaning works of art internationally, and
- loan return activities to private lenders overseas.

The National Gallery also uses Google GA4 which uses servers in the United States of America. We may also use IT systems and services from time to time which host information in servers in the European Union or the United States of America. We will not transfer your information overseas for any other reasons without your consent unless it is required or authorised by law. If personal information is disclosed overseas, the National Gallery will take reasonable steps to ensure that the overseas recipient does not breach the APPs.

## **19. DATA QUALITY STORAGE AND SECURITY**

The National Gallery takes reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. Storage and disposal of information is managed in accordance with the *Archives Act 1983* (Cth).

Depending on the circumstances, we may hold personal information in either hardcopy or electronic form or both. We have established security measures including protecting digital information in systems that comply with the Australian Government Protective Security Policy Framework and implementing managerial and

physical access controls to those with a 'need to know'.

Digital information is maintained both in externally hosted and on premises systems (i.e. by secure servers managed by National Gallery staff or stored in secure cloud-based solutions). We may, from time to time, expand our operations or change the cloud-based or other secure solutions we use. We can do this without notifying you but we will take reasonable steps to maintain the same level of security and protection.

### **19.1. NOTIFIABLE DATA BREACH (NDB) SCHEME**

We are committed to dealing promptly with any accidental or unauthorised disclosure of personal information in accordance with our reporting obligations under the Notifiable Data Breach Reporting Scheme.

If we need to investigate or resolve a problem, we may need to (and you authorise us to) disclose your personal information to our service providers, law enforcement or other government officials if necessary or appropriate to deal with the problem or if required by law.

### **19.2. PRIVACY THRESHOLD AND IMPACT ASSESSMENTS**

The Privacy Act and the Code requires the National Gallery to take reasonable steps to implement practices, procedures and systems that will ensure privacy compliance is designed into projects dealing with personal information from the start. As such the National Gallery conducts privacy threshold assessments (PTAs) and privacy impact assessments (PIAs) to assist the National Gallery in identifying any possible privacy impacts resulting from a project so they can be effectively managed and mitigated.

The National Gallery's Privacy Impact Assessment Register (PIA) is available via the National Gallery website here – [PIA Register](#).

## **20. COMPLAINTS**

### **20.1. PRIVACY COMPLAINTS**

If you are not happy with the way the National Gallery has handled your personal information, you can lodge a complaint, in writing to the Privacy Officer on the details below (see section 21, below). We may ask you to provide further details about your complaint and we may need to discuss your complaint with our staff, service providers and others as appropriate.

The National Gallery is committed to quick and fair resolution of complaints and will ensure that all complaints are taken seriously. We will take reasonable steps to deal with and respond to your privacy complaint within 30 days. If you are not satisfied with our response, you can also lodge a complaint with the Office of the Australian Information Commissioner.

### **20.2. NATIONAL GALLERY SERVICE CHARTER, FEEDBACK AND OTHER FORMAL COMPLAINTS**

More broadly, the National Gallery welcomes and values feedback and is committed to providing a positive, safe and welcoming environment and is working constantly to improve the services it offers. The National Gallery service charter outlines the other services that we provide, what you can expect from us, and how you can assist us to make improvements. The service charter is available [on the National Gallery website](#).<sup>3</sup>

The Feedback section on the National Gallery website outlines the ways you can provide feedback or submit a formal complaint (that is not related to a privacy complaint).

If you have a general enquiry and are not seeking to lodge a privacy complaint, a formal complaint or to provide feedback, please contact us via:

Email: [information@nga.gov.au](mailto:information@nga.gov.au)

Phone: +61 2 6240 6411.

## **21. HOW TO CONTACT US**

If you would like to request further information about how the National Gallery handles your information,

<sup>3</sup> As of July 2024 – see Service charter - National Gallery of Australia ([nga.gov.au](https://nga.gov.au)), available at < <https://nga.gov.au/about-us/feedback/service-charter/>>.

obtain access to your personal information, request a correction to the information we hold about you or, make a complaint about the way we handle your information, you can contact the Privacy Officer at:

National Gallery of Australia  
GPO Box 1150  
CANBERRA ACT 2601  
Call: +61 2 6240 6410  
Email: [privacy@nga.gov.au](mailto:privacy@nga.gov.au)

## 22. REVISION HISTORY

Version	Date	Policy Steward	Comments
V.3	9 May 2023	Manager, Legal and Procurement	Complete review of Policy undertaken as part of legislative compliance.
V.4	2 July 2024	Manager, Legal	Complete review of Policy undertaken as part of legislative compliance.

### 22.1. PRIVACY POLICY UPDATE

This Privacy Policy will be updated if our information handling practices change. We would encourage you to periodically review this Privacy Policy to be informed of how we are protecting your information.

# ANNEXURE 1

## Australian Privacy Principles (APPs)

### **APP 1 – Open and transparent management of personal information**

Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

### **APP 2 – Anonymity and pseudonymity**

Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply

### **APP 3 – Collection of solicited personal information**

Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of sensitive information.

APP 3 applies higher standards to the collection of sensitive information. Sensitive Information can only be collected with the individual's consent, if required by law or in other very limited circumstances and it must be reasonably

### **APP 4 – Dealing with Unsolicited personal information**

Outlines how APP entities must deal with unsolicited personal information.

### **APP 5 – Notification of the collection of personal information**

Outlines when and in what circumstances an APP entity that collects personal information must tell an individual about certain matters.

### **APP 6 – Use or disclosure of personal information**

Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.

For sensitive information the secondary purpose must be directly related to the original purpose.

### **APP 7 – Direct Marketing**

APP 7 sets out the way organisations can use or disclose personal information for direct marketing purposes.

### **APP 8 – Cross border disclosure of Personal Information**

Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.

Overseas disclosures are usually dealt with through contractual arrangements with the overseas providers.

### **APP 9 – Adoption, use or disclosure of government related identifiers**

APP 9 restricts the adoption, use and disclosure of government related identifiers by organisations. APP 9 may also apply to some agencies in the circumstances set out in s 7A.

### **APP 10 – quality of personal information**

An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

### **APP 11 – Security of personal information**

An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

### **APP 12 – Access to personal information**

Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.

### **APP 13- Correction of personal information**

Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.