# Data Security Policy and Procedures


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## Purpose

Establish a structured and consistent approach to protecting the confidentiality, integrity, and availability of information held by Grant Transformers. This policy ensures that Grant complies with applicable legislative requirements, including the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs), and adopts industry best practices for data protection.

## Scope

This policy applies to all Grant employees, board members, contractors, and third-party service providers who access, manage, store, or transmit Grant's data in any format.

Objectives

- To protect Grant Transformer's data assets from unauthorised access, disclosure, alteration, or destruction.
- To implement measures ensuring compliance with legislative and contractual obligations.
- To foster a culture of privacy, security, and accountability.

## Roles and Responsibilities

| Role | Responsibility |
|---|---|
| Executive Management | Governance and strategic oversight of data protection policies and frameworks. |
| Privacy Officer: Marco Da Silva | Oversight of privacy compliance, breach response, and staff training. |
| IT Service Provider: NSWIT | Implementation and maintenance of secure infrastructure and systems. |
| All Staff | Compliance with policy requirements and immediate reporting of potential or actual breaches. |

## Data Classification

Grant classifies data as follows:

- **Public:** Information freely available to the public (e.g., website content).
- **Internal Use:** Operational information restricted to authorised personnel.
- **Confidential:** Personal, sensitive, data requiring strict access controls.

All confidential data must be stored and transmitted using secure methods and only accessed on a need-to-know basis.

## Data Protection Controls

**a. Physical Security**

- Locked storage for physical files.
- Secured premises.
- Controlled access to client records.

**b. Electronic Security**

- Strong password protocols and device encryption.
- Multi-factor authentication for cloud systems (e.g., OneDrive).
- Regular patching, antivirus updates, and firewall configuration.

**c. Access Management**

- Role-based access controls.
- Onboarding and offboarding procedures for system access.
- Periodic access reviews.

**d. Retention and Disposal**

- Data retention aligned with legal and contractual obligations.
- Secure shredding of paper records.
- Certified data wiping of decommissioned electronic devices.

## Third-Party Engagements

- Service providers must adhere to privacy and security standards.
- Data sharing must be documented, with appropriate contractual safeguards.
- No personal or sensitive data may be transmitted via unapproved channels.

## Staff Training and Awareness

- Mandatory privacy and security training during onboarding.
- Annual refresher training.
- Ongoing internal communications to reinforce best practices and updates.

## Incident Response and Breach Management

All staff must report any suspected or actual data breaches to the Privacy Officer without delay.

Grant will:

- Immediately assess the scope and impact.
- Contain and mitigate any risks.
- Notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as per the Notifiable Data Breaches (NDB) scheme.

*Refer to the Grant NDB Response Plan for detailed steps.*

## Monitoring and Compliance

- Annual reviews of this policy and associated procedures.
- Security audits and system monitoring.
- Risk assessments as part of continuous improvement.

## Disciplinary Action

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or engagement. Legal action may be pursued where applicable.

## Contact Information

For any questions or concerns relating to data protection or this policy, please contact the Privacy Officer directly.

**Email:** marco@grant-transformers.com.au

**Phone:** 08 6146 2576

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