

**Social Impact Group Management Australia Pty Ltd**, trading as **SIGMA SDA** (ABN 39 685 266 022) (“SIGMA”, “we”, “us”, or “our”), is committed to protecting the privacy and security of all personal information we collect. This policy outlines how we manage personal and sensitive information in accordance with the *Privacy Act 1988 (Cth)*, the *Australian Privacy Principles* (APPs), and our obligations under the *NDIS Act 2013* and guidelines issued by the *NDIS Quality and Safeguards Commission*.

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## 1. Scope

This Privacy Policy applies to all personal information collected by SIGMA in relation to our Specialist Disability Accommodation (SDA) services, property management activities, business operations, and engagement with participants, stakeholders, and service providers.

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## 2. What Information We Collect

We may collect the following types of personal information, including sensitive and health-related data:

- Full name, date of birth, and contact details
- Residential address and emergency contact information
- NDIS number and plan details
- Health, disability, and support needs
- Financial and tenancy-related information
- Records of communication and service history
- Cultural background, language preferences, or legal guardianship

We may also collect technical data such as IP addresses, browser types, and usage statistics if you access our website.

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### 3. How We Collect Personal Information

We collect personal information through:

- Direct communications with you (phone, email, forms, in-person)
- Your support coordinator, allied health team, or nominee
- NDIA, NDIS-registered providers, or SIL partners
- Application forms for tenancy or services
- Our website, digital tools, or third-party platforms
- CCTV or security systems at our managed properties (where applicable)

Where lawful and practical, we allow you to interact with us anonymously or by using a pseudonym, but this may limit the services we can offer.

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### 4. Why We Collect Personal Information

SIGMA collects and uses your personal information to:

- Deliver SDA tenancy and housing support services
- Communicate and liaise with your nominated representatives
- Comply with NDIS operational and funding requirements
- Manage and maintain property leases, headleases, and vacancies
- Meet our legal, contractual, and regulatory obligations
- Improve the quality and safety of services
- Respond to incidents, complaints, or emergencies
- Conduct audits, research, and internal business reporting

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### 5. Use and Disclosure

Your personal and sensitive information is used or disclosed:

- To provide, coordinate, and monitor support services
- To registered NDIS providers, support coordinators, SILs, allied health professionals, and tenancy managers
- To third-party IT, legal, accounting, and property service providers under contract

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- To government bodies, the NDIA, or the NDIS Quality and Safeguards Commission where required by law
- To emergency services in the case of serious health or safety concerns
- With your consent, or otherwise in accordance with the law

All third parties who access your data are subject to confidentiality and security obligations.

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## 6. Data Security

We take reasonable steps to secure all personal information. This includes:

- Password-protected electronic systems
- Secure data storage and encrypted cloud services
- Physical access controls to our offices and records
- Internal staff policies and privacy training
- Periodic reviews of our data protection systems

If a data breach occurs, we will notify you and comply with the Notifiable Data Breaches scheme.

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## 7. Retention and Disposal

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected or as required by law. When it is no longer needed, we will destroy or de-identify it using secure methods.

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## 8. Access and Correction

You may request access to the personal information we hold about you and request corrections if the information is inaccurate, incomplete, or outdated. To do so, contact our Privacy Officer (see section 12). We will respond within 30 days.

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## 9. Cookies and Website Analytics

Our website may use cookies or analytics tools to improve user experience. These tools collect non-identifiable information such as browsing patterns and usage metrics. You can disable cookies via your browser settings, but some functionality may be affected.

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## 10. Overseas Disclosure

We do not routinely disclose personal information overseas. If overseas disclosure is required (e.g., for cloud software providers), we will ensure appropriate privacy safeguards are in place and that the recipient is subject to laws or contractual terms equivalent to the Australian Privacy Principles.

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## 11. Complaints

If you have a concern or complaint about our handling of your personal information, you can contact us directly. We aim to resolve all complaints promptly and fairly. If you are not satisfied with our response, you may contact:

- **Office of the Australian Information Commissioner (OAIC):** [www.oaic.gov.au](http://www.oaic.gov.au)
  - **NDIS Quality and Safeguards Commission:** [www.ndiscommission.gov.au](http://www.ndiscommission.gov.au)
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## 12. Contact Us

### Privacy Officer

### Social Impact Group Management Australia Pty Ltd

Level 2, Lobby 1, 76 Skyring Terrace, Newstead QLD 4006

 [inbox@sigma.net.au](mailto:inbox@sigma.net.au)

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