

Cornerstone Alliance

322 King William Street, Adelaide SA 5000, Australia

hello@cornerstonealliance.com.au

www.cornerstonealliance.com.au

Data Privacy & Confidentiality Policy

Purpose of Policy

This policy ensures that confidential and private information collected by Cornerstone Alliance in the delivery of multicultural marketing and NDIS compliance services is protected and only disclosed when necessary for service delivery or as required by law.

"Confidential Information" includes any information in any form (written, digital, or verbal) such as:

- Client personal details and cultural backgrounds
 - NDIS participant information and support plans
 - Marketing strategies and campaign data
 - Cultural assessment reports
 - Financial records and business intelligence
 - Supplier and contractor information
 - Internal policies, procedures, and proprietary methodologies
 - Any information not published by Cornerstone Alliance or otherwise in the public domain
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Policy Requirements

1. Staff Obligations

All employees, contractors, volunteers, and management personnel must:

- Sign and comply with the approved Confidentiality Agreement
- Demonstrate understanding of this policy through training
- Treat all confidential information as strictly secret and confidential
- Only disclose information when required for service delivery or legal compliance
- Never use confidential information for personal benefit or third-party advantage

2. Information Security

- All confidential information is stored digitally in approved cloud-based systems

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- Information cannot be copied, duplicated, or transmitted outside approved systems without director approval
- Client information (including names and cultural identifiers) is strictly confidential
- All stakeholder information is stored exclusively in digital format within secure cloud platforms
- Access to approved systems is restricted to approved staff with role-based permissions
- Personal devices may not be used to store confidential information outside approved company systems
- Two-factor authentication is required for all system access

3. Client Information Protection

- ALL client information is deemed strictly confidential
- Cultural and linguistic background information requires extra sensitivity
- NDIS participant information must comply with NDIS Commission standards
- Information is stored exclusively in approved systems with appropriate access controls
- Discussions about clients must only occur through secure communication channels or in private environments
- Screenshots or downloads of client information outside approved systems are prohibited

Collection and Use of Information

Information We Collect

Cornerstone Alliance may collect personal information including:

- Names, addresses, and contact details
- Cultural and linguistic backgrounds
- NDIS Compliance-specific information including participant numbers and support needs
- Marketing preferences and demographic information
- Professional affiliations and business relationships
- Accessibility requirements and cultural considerations

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Purpose of Collection

Information is collected to:

- Deliver culturally appropriate marketing services
- Ensure NDIS compliance and quality service delivery
- Develop targeted multicultural marketing campaigns
- Meet reporting requirements to funding bodies
- Maintain safety and cultural sensitivity standards

Information Sharing

- Information will NOT be disclosed to unauthorised parties
 - No information will be sent overseas without explicit consent
 - Sensitive cultural and NDIS information requires express permission for any use beyond direct service delivery
 - All collection, use, and disclosure complies with the Privacy Act 1988 and NDIS Act 2013
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Storage, Access and Retention

Secure Storage

- All personal information is maintained in secure cloud-based systems
- Digital security measures include password protection, two-factor authentication, and audit trails
- Regular automated backups ensure data integrity and recovery capabilities
- Information is NOT made available to third parties without legal requirement and individual authority
- System administrators monitor access logs and maintain security protocols

Access Rights

Individuals may:

- Request inspection of their personal information with reasonable notice
- Request corrections to incorrect information
- Receive copies of their information (subject to verification)
- Withdraw consent for non-essential information use

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Retention and Disposal

- All client data is kept only as long as necessary for service delivery
 - When retention is no longer required, information is permanently deleted from approved systems
 - Disposal methods include complete deletion from cloud storage and backup systems
 - System audit trails maintain records of information disposal for compliance purposes
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Cultural Sensitivity Requirements

Given our multicultural focus, Cornerstone Alliance will:

- Respect cultural protocols around information sharing
 - Understand that some cultural groups have specific privacy expectations
 - Provide information in appropriate languages when requested
 - Consider cultural factors in information collection and use
 - Train staff on culturally sensitive information handling
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NDIS Compliance

In accordance with NDIS requirements:

- Participant information is protected according to NDIS Commission standards
 - Information sharing follows NDIS guidelines for participant consent
 - Regular audits ensure ongoing compliance
 - Incident reporting procedures are followed for any privacy breaches
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Breach Response

In the event of a privacy breach:

1. Immediate containment and assessment
2. Notification to affected individuals (where required)
3. Reporting to relevant authorities (NDIS Commission, Privacy Commissioner)
4. Investigation and remediation
5. Review and improvement of systems

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Complaints and Compliance

Internal Complaints

Individuals with privacy concerns may contact:

- **Privacy Officer:** Narayan Ramchandani narayan@cornerstonealliance.com.au

External Complaints

Complaints may also be made to:

- NDIS Quality and Safeguards Commission
 - Office of the Australian Information Commissioner
 - Multicultural Affairs Commission (State-based)
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Supporting Legislation

- Privacy Act 1988 (Commonwealth)
 - NDIS Act 2013
 - NDIS (Code of Conduct) Rules 2018
 - Freedom of Information Act 1982
 - Racial Discrimination Act 1975
 - State-based multicultural and anti-discrimination legislation
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Contact

For questions or further information regarding this policy, please contact:

Sunita Miranda, Director

sunita@cornerstonealliance.com.au

Written by: Sunita Miranda

Approved by: Sunita Miranda

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