



Office of the Victorian
Information Commissioner

Privacy Impact Assessment

OVIC Website

Part 1 – Program background and details

Program	OVIC Website
Drafted By	Policy Team
Responsible Team	Communication and Education Team
Assessment Date	July 2021

Description and benefit of the website

OVIC's website is one of the first points of contact that members of the public, Victorian public sector (VPS) staff and other key stakeholders have with OVIC. The website is essential to achieving OVIC's policy and legislative functions as it:

- Enables an accessible front-facing online presence.
- Drives awareness of OVIC's functions and establishes OVIC as an authority in FOI, privacy and information security.
- Enables distribution of content such as guidance materials and policy documents, to the VPS and other government agencies more broadly, as well as the dissemination of information to the public.
- Promotes interaction and engagement through avenues such as the blog, events and training, newsletter, and social media.
- Enable agencies and the public to engage with the office, for example the newsletter sign-up, and event and training registration.

Parties involved including contracted service providers (CSPs)

Appendix A lists plugins installed on the website. The plugins provided by third parties do not collect personal information of visitors to the website. OVIC maintains control over personal information collected through the website.

The website is hosted on a private virtual server within a shared physical host environment. The hosting is provided by Discount Domain Name Services. More information can be found on their website [here](#).

Scope of this privacy impact assessment

The scope of this PIA covers the way personal information is collected and handled through the website. This includes information collected from individuals when they interact with the website (for example, when registering for events or training), as well as the information collected automatically from users when visiting the website (web analytics data).

The scope of this PIA also includes the plugins that enable functionality on the website. Personal information that passes through the plugins is **not** collected by these third-party plugins. All information is stored on OVIC servers. As such, this PIA only relates to personal information collected by OVIC.

Some of the plugins used by the website are integrated with MailChimp. OVIC uses MailChimp to manage mailing lists and to send newsletters via its email campaign functionality. A separate PIA and Security Risk Assessment has been completed on the use of MailChimp.

Legal authority

The objects of the *Privacy and Data Protection Act 2014 (PDP Act)* outlined in section 5 include:

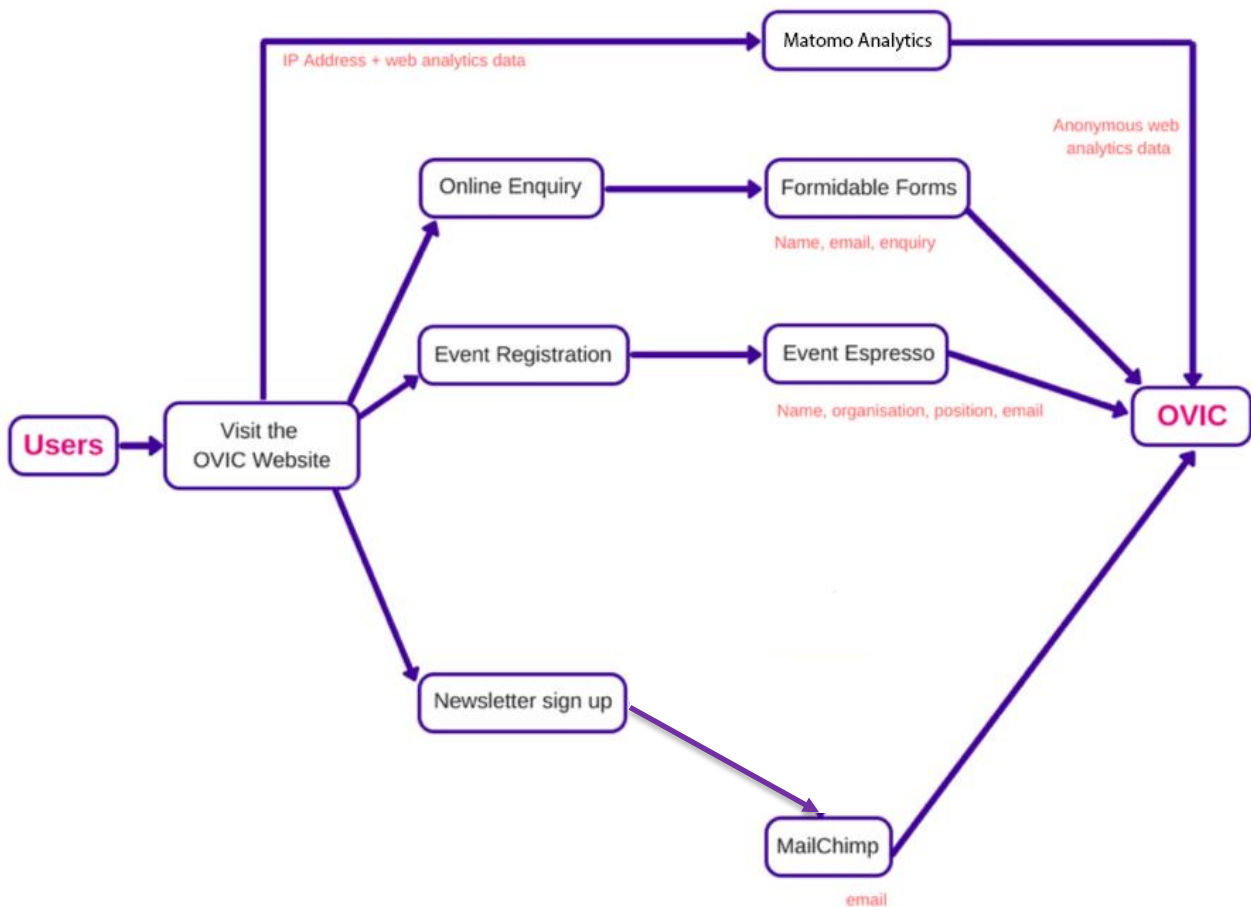
- to promote awareness of responsible personal information handling practices.
- to promote the responsible and transparent handling of personal information in the public sector.
- to promote responsible data security practices in the public sector.

Section 6I(2) of the *Freedom of Information Act 1982 (FOI Act)* includes the following functions:

- to promote understanding and acceptance of the FOI Act and the object of the Act.
- to provide advice, education and guidance in relation to compliance with professional standards.
- to provide advice, education and guidance in relation to the Information Commissioner's functions.

It is important for the awareness raising and educational functions detailed above to be made available in various formats including online. The website is essential for broad dissemination of resources and guidance to the general public and other government agencies. Personal information collected through the website is necessary to fulfil OVIC's functions as set out in the PDP Act and the FOI Act.

Information flow diagram



Part 2 – Privacy analysis

The part identifies the privacy elements and risks the program. The PIA Guide provides guidance on responding to the questions. The right column indicates the relevant section of the PIA Guide. Some questions may not be relevant or applicable. The response should be noted as N/A where this occurs.

Identify the information elements

	Question	Response	Guide
1	<p>Does the program involve personal information?</p> <p><i>List each piece of personal information that is involved in the program.</i></p>	<p>Yes. The program involves personal information. Personal information is collected from individuals who interact with the website in the following ways:</p> <p>Signing up to the OVIC newsletter - Individuals are prompted to provide their email address when signing up to the OVIC newsletter.</p> <p>Event registrations - When registering for OVIC training or events, individuals are asked to provide:</p> <ul style="list-style-type: none"> • Name • Email address • Agency/Organisation • Position • Dietary requirements (if catered) <p>Visiting OVIC website** – the website uses Matomo to collect information about users’ interaction with the website. The information collected includes:</p> <ul style="list-style-type: none"> • Network location and partial IP address • Date and time of visit • Type of web browser • Flash version, JavaScript support, screen resolution and screen colour processing ability • Referring site details (i.e. the URL that the user came through to arrive at the website) • Pages visited, and time spent on each page • Documents downloaded, and search terms used • Forms accessed on the website. <p>IP addresses** – IP anonymisation is enabled, which means that only part of an IP address is collected.</p> <p>Appendix A lists each plugin on the website, and the personal information collected by them.</p> <p>Appendix B contains the website privacy statement.</p> <p>**Note: IP addresses and analytics information (the information under the heading ‘visiting OVIC website’) would in most cases <u>not</u> be personal information, as this information cannot be used to identify an individual or reasonably ascertain their identity. However, for an abundance of caution, this PIA assumes that this information is personal information, and protects it accordingly.</p>	<p><i>Para No.</i> 6.2 – 6.5</p> <p><i>Page No.</i> 16 – 17</p>

2	<p>Does the program involve other information that has the potential to identify individuals?</p> <p><i>This may include information that does not appear to be personal information at first glance, but which could identify individuals based on the context of the project or how the program uses the information.</i></p> <p><i>Describe this other information and explain how it could potentially identify individuals within the context of your program.</i></p>	No.	<p><i>Para No. 6.6</i></p> <p><i>Page No. 17</i></p>
3	<p>Does the program involve sensitive information (as defined under Schedule 1 of the PDP Act)?</p> <p><i>Describe the type(s) of sensitive information that is involved in the program (if any), and how the collection or use of the sensitive information is authorised either by the PDP Act or other legislation.</i></p>	No. Individuals are not required to provide sensitive information when engaging with OVIC via the website.	<p><i>Para No. 6.7 – 6.9, 7.4</i></p> <p><i>Page No. 17 – 18, 20</i></p>
4	<p>Does the program involve health information?</p> <p><i>If the answer is yes, please refer to the Health Records Act 2001 or consult with the Health Complaints Commissioner in relation to health information (and where applicable, the Office of the Australian Information Commissioner).</i></p>	No. Individuals are not required to provide health information when engaging with OVIC via the website.	<p><i>Para No. 6.10</i></p> <p><i>Page No. 18</i></p>
5	<p>Does the program involve information that has previously been de-identified?</p> <p><i>Describe the type(s) of de-identified information that is involved in the program (if any), and the potential for re-identification.</i></p>	No. The program does not involve information that has previously been de-identified.	<p><i>Para No. 6.13 – 6.18</i></p> <p><i>Page No. 19</i></p>

Collection of personal information

6	<p>Is all the personal information collected necessary for the program?</p> <p><i>Explain why all the information collected is necessary for your program.</i></p>	Yes. All personal information collected through the website is necessary as it enables OVIC to fulfil its functions outlined in section 5 of PDP Act and section 6I of the FOI Act.	<p><i>Para No. 7.2 – 7.3</i></p> <p><i>Page No. 20</i></p>
<p>Privacy risk: If some personal information is not necessary for the program, consider whether there is a risk of overcollection.</p>			
7	<p>Do you need to collect information that identifies an individual for the purposes of the program, or can individuals remain anonymous?</p>	<p>Web analytics data: Individuals can remain anonymous as there is no way of attributing those actions to any specific individual. Individuals also have the option to ‘opt-out’ of the collection of web analytics data..</p> <p>Other instances such as events: Individuals cannot remain anonymous. For example, individuals need to provide their personal information when registering for training sessions or events.</p>	<p><i>Para No. 7.5</i></p> <p><i>Page No. 21</i></p>

8	<p>If individuals can remain anonymous, will you be collecting indirect identifiers, such as demographic information?</p>	No.	<p><i>Para No.</i> 6.3 – 6.4</p> <p><i>Page No.</i> 17</p>
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Method and notice of collection

9	<p>How will the personal information be collected?</p> <p><i>Describe the means by which the information will be collected. If personal information is collected via a third party platform, explain whether the platform will also be collecting that information</i></p>	<p>Personal information is collected directly from individuals when they register for events or sign up to the newsletter via the website.</p> <p>Web analytics data is collected through Matomo when individuals interact with the website.</p>	<p><i>Para No.</i> 7.7 – 7.8</p> <p><i>Page No.</i> 21</p>
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Privacy risk: Consider whether your method of collection is fair and not unreasonably intrusive.

10	<p>Is the personal information collected directly from the individual?</p>	<p>Yes. Personal information is collected directly from the individual when they register for an event or sign up to the newsletter.</p> <p>Web analytics data is collected through Matomo when individuals interact with the website.</p>	<p><i>Para No.</i> 7.9</p> <p><i>Page No.</i> 21</p>
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11	<p>Will the individual be notified about the collection of their personal information?</p> <p><i>Describe the steps taken to provide notice to the individual OR explain why notice will not be provided to the individual. Include a link or attach collection notices where appropriate.</i></p>	<p>Yes. Individuals are notified about the collection of their personal information. A collection notice is included at each point on the website where personal information is directly collected from individuals (for example, signing up for the newsletter, when registering for an event).</p> <p>The website privacy statement details how web analytics data is collected from website visitors. It is a broader collection notice for the website and its objective is to ensure that OVIC is taking the reasonable steps required by IPP 1.3. It is available here: https://ovic.vic.gov.au/privacy-statement/</p> <p>Individuals can also refer to OVIC’s privacy policy which includes broad information about how personal information is collected, used and disclosed. The privacy policy is available here: https://ovic.vic.gov.au/privacy-policy/</p>	<p><i>Para No.</i> 7.13 – 7.16</p> <p><i>Page No.</i> 22</p>
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12	<p>Will any personal information about the individual be collected indirectly from another source?</p> <p><i>Describe how and from which other sources the personal information will be collected.</i></p>	No. Personal information is not collected indirectly from another source.	<p><i>Para No.</i> 7.10 – 7.11</p> <p><i>Page No.</i> 21 – 22</p>
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Privacy risk: If you are collecting personal information indirectly, consider whether there is a risk of the information being inaccurate, out of date or incomplete. Consider the impact on individuals if they are not made aware that their information is being collected from another source.

13	<p>Will the individual be notified that their personal information has been collected from another source?</p> <p><i>Describe the steps taken to provide notice to the individual OR explain why notice will not be</i></p>	N/A	<p><i>Para No.</i> 7.15</p> <p><i>Page No.</i> 22</p>
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provided to the individual. Include a link or attach collection notices where appropriate.

Unique identifiers

<p>14</p>	<p>Will the program assign a unique identifier or collect a unique identifier assigned by another organisation to adopt as your organisation's own?</p> <p><i>Describe the unique identifier, the purpose for assigning or collecting it, and how this is authorised by either the PDP Act or other legislation.</i></p>	<p>Matomo assigns a unique identifier to website visitors, which is necessary for OVIC to carry out its functions efficiently by enabling analysis of OVIC's website – such as engagement, entry pages, and page visits. Noting this, the identifier is not attributable back to any specific individual.</p> <p>Note: OVIC does not use or share the unique identifier assigned by Matomo for any other purposes.</p>	<p><i>Para No.</i> 7.18 – 7.19</p> <p><i>Page No.</i> 23</p>
<p>15</p>	<p>Does the program require an individual to provide a unique identifier?</p> <p><i>Explain why or how the provision of a unique identifier is necessary for the program.</i></p>	<p>No. Individuals are not required to provide a unique identifier to engage with OVIC via the website.</p>	<p><i>Para No.</i> 7.20 – 7.21</p> <p><i>Page No.</i> 23</p>

Quality of personal information

<p>16</p>	<p>What steps will you take to ensure the personal information collected is accurate, complete, and up to date?</p>	<p>All personal information collected via the website is collected directly from the individual and is therefore assumed to be accurate, complete and up to date at the time of collection.</p> <p>When an individual signs up to receive OVIC's newsletter, a confirmation email is sent to the email address provided during the sign up process to confirm it is the right email address and provide mechanisms for the individual to update their details or opt of the mailing list if they wish to.</p>	<p><i>Para No.</i> 9.16 – 9.18</p> <p><i>Page No.</i> 27 – 28</p>
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Privacy risk: If there are inadequate or no steps taken, consider whether there is a risk that the information will be inaccurate, incomplete or out of date.

Security of personal information

<p>17</p>	<p>Are there security measures in place (existing or intended) to protect the personal information collected and used for this program?</p> <p><i>List the policies, procedures, or controls that your organisation implements to protect personal information. Please indicate how these measures will be governed. Include links or attachments where appropriate</i></p>	<p>Yes. A Website Security Risk Assessment and penetration test report detailed security risks, controls and mitigation strategies.</p>	<p><i>Para No.</i> 8.2 – 8.9</p> <p><i>Page No.</i> 23 – 25</p>
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18	<p>Where and how will personal information be stored?</p> <p><i>Describe the format in which the personal information will be stored (e.g. electronic, hard copy etc.) and where it will be stored (e.g. internally, external provider, cloud, third party platform etc.)</i></p>	<p>All personal information collected through the website for training and event registration is stored on Event Espresso/Wordpress, which is hosted on OVIC servers.</p> <p>Web analytics data is stored on Matomo which is hosted internally on OVIC servers.</p> <p>Note: When an individual signs up for the newsletter via the website, their information is transferred to MailChimp servers which may be based in the US or elsewhere. Individuals are notified of this via OVIC’s privacy statement and during the sign-up process so they can decide whether they want to provide their email address with the knowledge that Mailchimp will receive it.</p>	<p><i>Para No. 8.2 – 8.9</i></p> <p><i>Page No. 23 – 25</i></p>
19	<p>Who will have access to the personal information?</p> <p><i>Describe the positions that will have access how access is gained or controlled, and whether it is logged.</i></p>	<p>The following have access to personal information collected through the website:</p> <ul style="list-style-type: none"> • Communications and Education Team • Information Technology Team • Staff who have login access to the website backend. <p>The following have access web analytics data collected via Matomo:</p> <ul style="list-style-type: none"> • Communications and Education Team • Information Technology Team • External web support staff (currently Versa). 	<p><i>Para No. 8.2 – 8.9</i></p> <p><i>Page No. 23 – 25</i></p>
20	<p>Have you completed a separate security risk assessment?</p> <p><i>If so, please refer to or attach a copy of the assessment to this PIA. If not, OVIC suggests you complete a security risk assessment.</i></p>	<p>Yes. Please refer to the Website Security Risk Assessment.</p>	<p><i>Para No. 8.10 – 8.11</i></p> <p><i>Page No. 25</i></p>

Privacy risk: If there are inadequate or no security measures in place, consider whether there is a risk that the information will not be properly protected, leading to loss, misuse, or unauthorised access, modification or disclosure.

Primary and additional uses and disclosures of personal information

21	<p>Is the personal information (including any sensitive information) involved in this program used or disclosed for the main or primary purpose for which it was collected?</p> <p><i>Describe what personal information will be used or disclosed, and for what purposes.</i></p>	<p>Yes.</p> <p>Personal information is used for:</p> <ul style="list-style-type: none"> • registering individuals for events or training • signing up individuals to the newsletter. <p>Web analytics data is used to:</p> <ul style="list-style-type: none"> • evaluate website performance and traffic • security audits, if required. 	<p><i>Para No. 9.2</i></p> <p><i>Page No. 25</i></p>
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22	<p>Does the program use or disclose personal information (including sensitive information) for a new or additional purpose other than the original purpose of collection?</p> <p><i>Describe the new/additional purpose for the use or disclosure of the information and explain how it is authorised, by either the PDP Act or other legislation. If relying on IPP 2.1(a), explain how the secondary use or disclosure is related to the primary purpose of collection.</i></p>	No. Personal information collected via the website is not used for any secondary purpose.	<p><i>Para No. 9.3 – 9.4</i></p> <p><i>Page No. 26</i></p>
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Privacy risk: If relying on IPP 2.1(a) to use personal information for a secondary purpose, consider whether individuals would reasonably expect their information to be used for that secondary purpose. If relying on IPP 2.1(b) to use personal information for a secondary purpose, ensure the individual's consent is meaningful.

23	<p>Will the individual be notified of the additional use(s) of their personal information?</p> <p><i>Explain how the individual will be given notice of the secondary use(s) of their information, or why notice of the secondary use will not be provided.</i></p>	N/A	<p><i>Para No. 9.4</i></p> <p><i>Page No. 26</i></p>
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Transfer and sharing of personal information

24	<p>Will any personal information be shared outside of your organisation?</p> <p><i>Describe:</i></p> <ul style="list-style-type: none"> • what information will be shared; • with whom the information will be shared; • the frequency of the disclosure; • how the information will be shared; and • how the disclosure is authorised by either the PDP Act or other legislation. <p><i>Identify whether any information sharing agreements are or will be in place.</i></p>	<p>Personal information collected through the use of the website will not be shared unless required by law.</p> <p>Note: When an individual signs up for the newsletter via the website, their information is transferred to MailChimp servers which may be based in the US or elsewhere. Individuals are notified of this via OVIC's privacy statement and during the sign-up process so they can decide whether they want to provide their email address with the knowledge that Mailchimp will receive it.</p>	<p><i>Para No. 9.6 – 9.7</i></p> <p><i>Page No. 26</i></p>
25	<p>Will any personal information be transferred outside Victoria?</p> <p><i>Describe what information will be transferred, to whom the information will be transferred, in which jurisdiction the information will be stored, and how the information will be transferred. Explain how the transfer is authorised by either the PDP Act or other legislation.</i></p>	<p>No. Personal information collected via the website will not be transferred outside Victoria.</p> <p>Note: When an individual signs up for the newsletter via the website, their information is transferred to MailChimp servers which may be based in the US or elsewhere. Individuals are notified of this via OVIC's privacy statement and during the sign-up process so they can decide whether they want to provide their email address with the knowledge that Mailchimp will receive it.</p>	<p><i>Para No. 9.8 – 9.9</i></p> <p><i>Page No. 26</i></p>

Other considerations relating to use and disclosure

26	<p>Does the program use or disclose a unique identifier assigned by another organisation?</p> <p><i>Describe the unique identifier and how it will be used or disclosed, and whether this is authorised by either the PDP Act or other legislation.</i></p>	No.	<p><i>Para No. 9.10 – 9.11</i></p> <p><i>Page No. 27</i></p>
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27	<p>Will any data matching occur as part of this program? This includes matching datasets within the program, or matching to other datasets external to the program.</p> <p><i>If so, explain the purpose for the data matching, what personal information will be matched and what other datasets it will be matched with, and what the combined dataset will be used for.</i></p>	No.	<p><i>Para No. 9.13 – 9.14</i></p> <p><i>Page No. 27</i></p>
28	<p>Will any personal information be de-identified as part of the program?</p> <p><i>Describe the purpose for de-identifying personal information for the program, the method of de-identification, how the de-identified information will be used, and the potential for re-identification.</i></p>	No.	<p><i>Para No. 6.14 – 6.18</i></p> <p><i>Page No. 19</i></p>

Privacy risk: If personal information is de-identified, consider whether there is a risk that the information can be re-identified. For example, de-identified information may be re-identifiable when matched to other information, or because of the way the de-identified information is used in the context of this program.

29	<p>What will be done to ensure the ongoing accuracy, completeness, and currency of the personal information?</p> <p><i>Describe the steps that will be taken, or the measures that are in place, to ensure the ongoing integrity of the information.</i></p>	Personal information collected for training and event registration is collected directly from the individual and is therefore assumed accurate, complete and up to date.	<p><i>Para No. 9.16 – 9.18</i></p> <p><i>Page No. 27 – 28</i></p>
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Management of personal information

30	<p>Is there a document available to the public that sets out your organisation's policies for the management of personal information, such as a privacy policy?</p> <p><i>Identify the document(s) and provide a link where available or include as an attachment to this PIA.</i></p>	<p>Yes. OVIC's privacy policy provides general details on how personal information is handled by OVIC. The privacy policy is available on the website at https://ovic.vic.gov.au/privacy-policy/</p> <p>The website privacy statement provides details regarding the collection of web analytics data. The website privacy statement is available at https://ovic.vic.gov.au/privacy-statement/</p> <p>A collection notice is included at each point on the website where personal information is directly collected from individuals (for example, signing up for the newsletter, when registering for an event).</p>	<p><i>Para No. 10.2, 10.5</i></p> <p><i>Page No. 28</i></p>
31	<p>Will the document be updated to reflect the new collection or use of personal information for the purposes of this program?</p> <p><i>If not, explain why.</i></p>	These documents are updated as and when required.	<p><i>Para No. 10.3</i></p> <p><i>Page No. 28</i></p>
32	<p>Is there a way for a person to find out the types of personal information your organisation holds about them? Can you tell them the purposes for which it is held, and how your organisation collects, holds, uses and discloses that information?</p> <p><i>Describe the steps and provide links where</i></p>	<p>Individuals can contact OVIC staff (for example case managers or guidance officers) or OVIC's privacy officer to find out the personal information OVIC holds about them, the purposes for which it is held and how OVIC manages that information.</p> <p>OVIC's privacy policy outlines these matters.</p>	<p><i>Para No. 10.4 – 10.5</i></p> <p><i>Page No. 28</i></p>

relevant.

Access and correction of personal information

33

How can individuals request access to, or correct their personal information?

Identify the avenues available for individuals to request access to or correction of their personal information, and who is responsible for handling such requests.

Individuals who wish to access or correct the personal information provided via the website can contact the Communications and Education Team via communications@ovic.vic.gov.au.

Para No.
10.6 – 10.7

Page No.
29

Privacy risk: If engaging third parties such as contracted service providers, consider whether there are arrangements in place to allow access and correction of personal information held by third parties. If not, there may be a risk that individuals cannot access or correct their personal information.

Retention and disposal of personal information

<p>34</p>	<p>How long will the personal information be kept for?</p> <p><i>Describe any relevant retention and disposal schedules or policies, including those issued by the Keeper of Public Records or those in other legislation.</i></p>	<p>The RDA for records of common administrative functions will apply to the use of the website for activities associated with disseminating publications and records documenting distribution activities.</p> <p>PROS 07/01 VAR4, point 15.1.1, page 118, and 19.5.5, page 131, which holds that these records should be destroyed after administrative use has concluded.</p> <p>Enquiries and public reaction fall under PROS 07/01 VAR4, point 2.7, and require records to either be retained as state archives, or destroyed after 2-5 years depending on the nature of the enquiry.</p> <p>Records pertaining to administrative arrangements of events fall under 2.2.1 and should be destroyed 2 years after the action has been completed.</p>	<p><i>Para No. 11.2 – 11.3</i></p> <p><i>Page No. 29 – 30</i></p>
<p>35</p>	<p>How will personal information be destroyed once it is no longer required?</p> <p><i>Describe the method of destruction and explain how that method is secure.</i></p>	<p>Personal information provided for training and event registration will be deleted from Event Espresso once it is no longer required.</p>	<p><i>Para No. 11.4</i></p> <p><i>Page No. 30</i></p>
<p>36</p>	<p>As an alternative to destroying personal information, will any personal information be de-identified once it is no longer required?</p> <p><i>Describe the method of de-identification that will be used and the purposes to which the de-identified information will be put.</i></p>	<p>No.</p>	<p><i>Para No. 11.6 – 11.7</i></p> <p><i>Page No. 30</i></p>
<p>Privacy risk: If de-identifying personal information once it is no longer required, consider whether there is a risk that the information can be re-identified.</p>			
<p>37</p>	<p>If applicable, what will happen to personal information held by third parties (such as contracted service providers, cloud storage, third party platforms etc.)?</p> <p><i>Describe any arrangements (for example, any contractual provisions) in relation to third parties' obligations to retain and dispose of personal information.</i></p>	<p>N/A</p>	<p><i>Para No. 11.9 – 11.10</i></p> <p><i>Page No. 30 – 31</i></p>
<p>Privacy risk: If there are no arrangements in place relating to third parties' retention and disposal of personal information, consider whether there is a risk that personal information will be held indefinitely.</p>			

Other considerations

<p>38</p>	<p>Who can individuals complain to if they have concerns about the handling of their personal information?</p> <p><i>Identify the avenues (internal and external) for making a privacy complaint, including who is responsible for complaint handling.</i></p>	<p>Individuals can contact OVIC's privacy officer if they have concerns about the handling of their personal information.</p> <p>Email: privacy@ovic.vic.gov.au Phone: 1300 006 842 Post: PO Box 24272, Melbourne VIC 3001</p>	<p><i>Para No. 12.2 – 12.4</i></p> <p><i>Page No. 31</i></p>
<p>39</p>	<p>Does your organisation have a data breach response plan in place?</p> <p><i>If so, describe at a high level the steps that your organisation will take in the event of a data breach.</i></p>	<p>Yes. OVIC has a data breach response plan in its Business Continuity plan.</p> <p>OVIC has a security handbook that contains a security incident management framework and an incident reporting section. It states that any breaches of privacy relating to personal information provided by or collected on behalf of OVIC needs to be reported to the privacy officer.</p>	<p><i>Para No. 12.5 – 12.6</i></p> <p><i>Page No. 31 – 32</i></p>
<p>40</p>	<p>Will any training be provided to staff to ensure the appropriate collection and handling of the personal information collected for this program?</p> <p><i>Describe the type of training staff will receive.</i></p>	<p>There is no specific training provided to staff who have access to the personal information collected via the website.</p>	<p><i>Para No. 12.7</i></p> <p><i>Page No. 32</i></p>
<p>41</p>	<p>Will the program be evaluated against its objectives?</p> <p><i>Describe who will evaluate the program, at what point in the program evaluation will occur, and how often.</i></p>	<p>Yes. The Communications and Education Team report monthly on the website.</p>	<p><i>Para No. 12.8</i></p> <p><i>Page No. 32</i></p>
<p>42</p>	<p>Does the program comply with your organisation's other information handling or information management policies?</p>	<p>Yes.</p>	<p><i>Para No. 12.9</i></p> <p><i>Page No. 32</i></p>
<p>43</p>	<p>Will this PIA be published?</p>	<p>No.</p>	<p><i>Page No. 7</i></p>
<p>44</p>	<p>Are there any other broader privacy considerations associated with this program?</p>	<p>No.</p>	<p><i>Para No. 12.10</i></p> <p><i>Page No. 32</i></p>
<p>45</p>	<p>Has the organisation's privacy officer been consulted?</p> <p><i>The organisation's privacy officer should be consulted.</i></p>	<p>Yes.</p>	<p><i>Page No. 6</i></p>

Part 3 – Privacy risk assessment

This part lists any privacy risks that have been identified as part of the analysis in Part 2. Refer to sections 13 – 16 in Part 3 of the PIA Guide (pages 33 – 35) for guidance on completing the risk assessment table.

<p>Were any privacy risks identified in the privacy analysis completed in Part 2 of this PIA?</p>	<input type="checkbox"/> Yes Enter each privacy risk in the risk assessment table below	<input checked="" type="checkbox"/> No Proceed to Part 4 of this PIA.
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	Description of risk	Consequence rating	Likelihood rating	Overall risk rating	Accept	Risk management strategy	Residual consequence rating	Residual likelihood rating	Residual risk rating	Owner
1										

**Add more rows by clicking in the bottom right cell and pressing 'tab'

Use the below risk table to determine the risk rating of each identified privacy risk.

OVIC Risk Table		Select a 'Consequence Rating' from the purple row				
		Insignificant	Minor	Moderate	Major	Extreme
Select a 'Likelihood Rating' for the purple column	Almost Certain	Medium (5)	High (10)	Very High (15)	Very High (20)	Very High (25)
	Likely	Low (4)	High (8)	High (12)	Very High (16)	Very High (20)
	Possible	Low (3)	Medium (6)	Medium (9)	High (12)	Very High (15)
	Unlikely	Low (2)	Low (4)	Medium (6)	Medium (8)	High (10)
	Very Unlikely	Low (1)	Low (1)	Low (3)	Medium (4)	High (5)

Part 4 – Action items and document information

This part details any action items identified and document information. Refer to sections 18 – 22 in Part 4 of the PIA Guide (pages 33 – 38) for more information.

Action items

	<i>Action</i>	<i>Owner</i>	<i>Timeframe</i>	<i>Completed</i>
1	N/A			

**Add more rows by clicking in the bottom right cell and pressing 'tab'

Document information

<i>Title</i>	OVIC PIA – Website
<i>Location</i>	Content Manager Reference: D20/14171
<i>Owner</i>	Policy team, OVIC
<i>Consultation / Distribution</i>	Communication and Education Team Legal Team Privacy and Data Protection Commissioner Chief Operating Officer and Privacy Officer Information Commissioner Privacy Guidance and Assurance Team
<i>Related Documents</i>	OVIC Security Risk Assessment Covering brief - D21/13155
<i>Next review</i>	July 2022
<i>Version</i>	Version 2.0

Appendix A – Website plugins

<i>Active plugins</i>	<i>Description</i>	<i>Information handled</i>	<i>Documentation</i>
Advanced Custom Fields Pro	A standalone WordPress plugin that allows for the creation and management of website content.	Nil (only provides functionality)	Terms and Conditions Privacy Policy Cookie Policy Resources
Advanced Custom Fields: Flexible Content Field	Content manager for website content and media.	Nil (only provides functionality)	Flexible Content Fields Documentation
Advanced Custom Fields: Options page	Provides a set of functions that allows the addition of extra, custom admin pages used to edit ACF fields	Nil (only provides functionality)	Options Page Documentation
Advanced Editor Tools	Provides Microsoft Word look alike content editing tools	Nil (only provides functionality)	https://en-au.wordpress.org/plugins/mce-table-buttons/
All In One WP Security & Firewall	Gives OVIC website extended security functionality, lock out times for hackers, user account security, firewall protection etc	This plugin may collect IP addresses for security reasons. Brute force login threat IP addresses and IP addresses of people attempting to access restricted areas are logged and stored on our server. No information is transmitted to third parties or remote server locations.	https://en-au.wordpress.org/plugins/all-in-one-wp-security-and-firewall/
Classic Editor	Allows the old WordPress content editor to be enabled	Nil (only provides backend functionality)	
Comment Anonymous	Provides anonymity opt-in in comment form	Nil (provides extra functionality in comment form) Note: comments are disabled on the OVIC website	
Custom Opt Out (Matomo)	Allows custom CSS to be written to the Matomo GDPR opt out function	Nil (only provides backend functionality)	https://matomo.org/
Custom Sidebar	Allows custom side bars to be implemented	Nil (only provides functionality)	https://wordpress.org/plugins/custom-sidebars/
Easy Footnotes	Enables footnotes to be added to a page via a shortcode	Nil (only provides functionality)	https://en-au.wordpress.org/plugins/easy-footnotes/

Event Espresso	Online event registration and ticketing management plugin	Name, agency, email, position (as a minimum, this can be customised to collect other information) Event espresso doesn't collect the information – all information is stored in the back end of the website. OVIC retains control over the personal information.	Website Documentation Privacy Notice Privacy Policy Terms and Conditions
Event Espresso – States/Provinces Pack: Australia		Nil (only provides functionality)	See Event Espresso
Event Espresso – Attendee Mover	Enables functionality for an attendee to be moved between events	Nil (only provides functionality)	See Event Espresso
Event Espresso – Wait Lists	Gives registrants the option to register onto a waiting list	Nil (only provides functionality)	See Event Espresso
Expanding Archives	A widget that shows old posts expandable by year and month	Nil (only provides functionality)	See Event Espresso
Formidable Forms	WordPress plugin that allows for the creation of online forms including contact forms, polls and surveys, lead generation forms and email forms.	Used on the 'contact us' page – directs enquiries (including first and last name, email, and free text for the enquiry) to an email.	Privacy Policy Support Forum
Formidable Forms Pro	Extends the functionality of the standard iteration of Formidable Forms	See Formidable Forms	Privacy Policy Support Forum
Formidable MailChimp	Links the Formidable Forms plugin to a MailChimp account for the creation of a mailing list.	Nil (only provides functionality)	MailChimp signup forms
Formidable Visual Views	Allows Formidable Forms display to be customised	Nil (only provides functionality)	https://formidableforms.com/knowledgebase/
Jquery updater	Updates Jquery libraries to latest version	Nil (only provides functionality)	https://en-au.wordpress.org/plugins/jquery-updater/
Matomo Analytics	Website analytics plugin	Collects an anonymised information regarding the behaviour of a visitor to the OVIC website. Information is stored on the OVIC server. No third parties involved.	https://matomo.org/ https://matomo.org/privacy/
Nested Pages	Provides a drag and drop interface for managing pages within WordPress admin	Nil (only provides functionality)	

Raw HTML Snippets	Allows web developers to insert chunks of HTML into a Wordpress page via shortcode	Nil (only provides functionality)	https://en-au.wordpress.org/plugins/raw-html-snippets/
Redirection	Allows web developers to create re-directs.	Nil (only provides functionality)	https://github.com/kylephillips/wp-nested-pages
Relevanssi premium	Website search tool that can search web content, PDF contents, custom fields, user profiles, taxonomy terms and shortcode output.	Nil (only provides functionality)	Website Privacy Policy
SearchWP Live Ajax Search	Makes real time search results available to the search bar	Nil (only provides functionality)	https://searchwp.com/extensions/live-search/
TablePress	Provides functionality with the Wordpress Application to create tables.	Nil (only provides functionality)	https://tablepress.org/documentation
UberChart	Provides functionality within the Wordpress Application to create charts and tables	Nil (only provides functionality)	https://sendgrid.com/docs/
User Role Editor	Allows for the modification of standard WordPress user roles' capabilities.	Nil (only provide a functionality)	Website Documentation
Visual Editor Custom buttons	Creates custom buttons in WordPress Visual Editor	Nil (only provides functionality)	https://en-au.wordpress.org/plugins/visual-editor-custom-buttons/
WP Add Custom CSS	Allows content creator to create custom CSS per page or post	Nil (only provides functionality)	https://en-au.wordpress.org/plugins/wp-add-custom-css/
WP All Import Pro	Provides functionality to the Wordpress Application administrators for importing excel spreadsheet documents`	Nil (only provides functionality)	http://www.wpallimport.com/
WP Mail SMTP	Configures Wordpress to send and validate emails via SMTP to Mailchimp's Transactional Email service	Nil (only provides functionality)	https://wpmailsmtp.com/
WP Super Cache	Optimises website caching for fast caching for visitors	Nil (only provides functionality)	https://en-au.wordpress.org/plugins/wp-super-cache/
wpDataTables	Provides content creators to create rich data tables	Nil (only provides functionality)	https://wpdatatables.com/
Yoast SEO	Performs analytics and allows for search engine optimisation through the use of keywords.	Nil (only provides functionality)	Website Privacy Policy

	Also provides feedback on the SEO performance of the website		
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Appendix B – Privacy notice

WEBSITE PRIVACY STATEMENT

The Office of the Victorian Information Commissioner (OVIC) is committed to protecting your privacy. We handle personal information in accordance with the *Privacy and Data Protection Act 2014* (Vic) (PDP Act) and other applicable legislation.

This privacy statement explains what information is collected when you visit our website and when you interact with us on social media. For information about how we handle personal information more generally, please refer to our [privacy policy](#).

INFORMATION WE COLLECT WHEN YOU USE THE OVIC WEBSITE

Web analytics data

We use Matomo Analytics to track your use of our website. When you visit our website, your web browser sends information about your computer and how you use our website to OVIC's Matomo Analytics server. This server is hosted by OVIC. We use first party cookies and device fingerprinting to recognise you between visits. We use the information we collect to understand how our website is used, and to allow us to improve it and the resources we publish.

For information about the sort of information we track, please refer to [Matamo's website](#). You can contact us if you would like to know more.

You can choose to opt out of being tracked by Matamo Analytics by unchecking the opt-out box at the top of this page or by enabling 'Do Not Track' in your browser. If you choose to disable tracking, you will still be able to access our website.

Web server logs

Whenever you attempt to access a page on OVIC's web site, our web server receives information that it needs to deliver the page to you. This includes information about your computer, including its internet protocol (IP) address. This information is temporarily kept in our server logs for the purpose of website maintenance and security.

If you do not want this information to be collected, you should not access OVIC's website. You may still access our services by contacting us.

Online services

We also collect information you choose to send to us via our website. This includes personal information collected via online forms and learning modules, events and training registration, blog comments or when subscribing to receive newsletters. We collect this information for the purpose of delivering our online services to you.

When we ask you to provide personal information for an online service, we will usually provide you with a notice specific to that collection.

If you choose not to provide us with the information we need to deliver these services to you, you may not be able to access them. If you [contact us](#) we will assist you to access our services another way wherever possible.

LINKS TO THIRD PARTY WEB PAGES AND SERVICES

Our website includes links to pages and services provided by third parties. Where you access links to web pages or services that are not at the ovic.vic.gov.au domain, you will be leaving OVIC's website, and going

to a web page controlled by a third party. Information collected on those third party web page will be managed in accordance with the third party's own privacy policies.

Our website also includes embedded videos hosted on Vimeo, which may result in Vimeo collecting personal information.

Whenever you attempt to access a page on OVIC's web site that has embedded video, Vimeo's web server receives information that it needs to deliver the video and video player to you. This includes information about your computer, including its internet protocol (IP) address. Full details are available in Vimeo's privacy policy.

INFORMATION WE COLLECT ON SOCIAL MEDIA

We use social media including Twitter and LinkedIn to communicate with the public and with the organisations we regulate. We may collect information posted on social media for the purpose of engaging with and understanding the views of the community. If you prefer not to communicate with us on social media, please contact us in another way.

DISCLOSURE OF INFORMATION

We do not share information about individual website or social media users with any organisation or person outside OVIC, except:

- where the information was collected for a service that is delivered by a third party on our behalf. For example, if you sign up for our newsletter, we will share your email address with Mailchimp, and if you sign up to privacy or FOI training, we will share your details with whoever is delivering the training for us.
- for the purpose of an investigation into suspected unlawful activity involving our website (for example, hacking or online fraud).

ACCESS AND CORRECTION

You may request access to, or correction of, documents that contain your personal information which are in our possession. For information on how to make a request for access or correction, please contact us.

In some cases, requests for access or correction will be handled in accordance with the *Freedom of Information Act 1982* (Vic).

CONTACT US

For more information, you can [contact us](#) on 1300 006 842 (1300 00 OVIC) or by email at enquiries@ovic.vic.gov.au.