

Customer Status Policy



1. Introduction

- 1. The Royal Australian Mint (**Mint**) is required to comply with the <u>Privacy Act 1988</u> (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**). However, the Mint is not a separate entity for the purposes of the Privacy Act as the Mint is part of the Department of the Treasury (**Treasury**) (because it is a Category E body within the Treasury portfolio), which is an 'agency' for the purposes of the Privacy Act.
- 2. As part of its functions and activities, the Mint collects, uses, discloses and stores a range of information that is 'personal information' for the purposes of the Privacy Act. Some of this personal information is also 'sensitive information' for the purposes of the Privacy Act. For example, the Mint collects a range of personal information about individuals who are a **Customer** of the Mint.
- 3. The Mint is committed to:
 - a. ensuring that the personal information it collects, holds, uses and discloses is handled in accordance with the Privacy Act and the APPs;
 - b. creating and embedding a culture that respects privacy and treats personal information as a valuable asset; and
 - c. building community trust and confidence in its information handling practices.

2. Purpose

- 4. The purpose of this Customer Status Policy (Policy) is to clearly set out when the Mint must delete personal information about Customers in the Mint's Customer Relationship Management (CRM) database.
- 5. All officers, employees and contractors of the Mint (described in this Policy as Mint Staff) must comply with this Policy.

3. Policy

- 6. It is important that the Mint:
 - a. complies with its obligations under the Archives Act 1983 (Cth) (Archives Act); and
 - b. only holds personal information until:
 - i. it can be deleted or destroyed in accordance with the Archives Act; or

- ii. it is no longer required for the purposes of administering the operations of the Mint.
- 7. Class 21664 of the Mint's Records Authority titled <u>Circulating Coin, Gallery & Education</u>

 <u>Management, and Numismatic Coin</u> (Relevant RDA) provides that the following types of records can be destroyed 7 years after 'last action':
 - records documenting all other routine tasks supporting the numismatic coin operations function.
 Includes agreements with customers, demand forecasts, minor security breaches, coin programs, currency determinations, machine maintenance and calibration and testing of equipment, materials usage, quality assurance, and waste management; and
 - the marketing and selling of the Mint's products and service. Includes records documenting sales through the retail shop, the call centre, online and wholesale sales, product development, research, liaison, customer services, graphic designs and advertising.
- 8. Therefore, in accordance with the Relevant RDA, a Customer's personal information in the CRM must be 'flagged' in the CRM when 7 years has passed since the Customer last interacted with the Mint (e.g. when the Customer last purchased a product from the Mint, or last corresponded with the Mint).
- Deletion of personal information in accordance with paragraph 8 is consistent with the Mint's obligations under the <u>Anti-Money Laundering and Counter-Terrorism Finance Act 2006</u> (Cth) (AML/CTF Act).
- 10. Each year, the Mint must ensure that the personal information of any Customers that have been 'flagged' is permanently deleted from the CRM.

4. Review of this Policy

11. The Privacy Officer must review this Policy at least annually, or sooner if there are any amendments to the Relevant RDA or the record retention obligations in the AML/CTF Act.

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