AI, PRIVACY & DATA

Privacy, confidentiality & data handling

Handle client information for an agreed purpose, limit access and make relevant collection and sharing understandable.

DOCUMENT	PREPARED	STATUS
MSP-10	1 October 2026	Draft for adoption

Scope & application

Personal information and confidential business data in support, administration and managed services. Client notices and applicable jurisdictional requirements must be identified for the engagement.

Who does what

NovaSoft engagement lead

Scopes the work, assigns authorised personnel and maintains implementation and exception records.

Client service and risk owners

Approve access, business decisions, priorities, notices and residual risks; provide accurate scope and timely lifecycle requests.

Users and suppliers

Follow the approved arrangements, report issues and perform responsibilities assigned in the service schedule.

Draft for adoption. Confirm applicable requirements, implementation, owners and approval in the written client service schedule before operational use. Effective date is assigned on adoption.

THE POLICY IN PRACTICE

Control requirements.

01 Identify the information

Record categories, business purpose, sensitivity, locations and authorised users. Reduce information collected in tickets and diagnostics to what is required to investigate or deliver the task.

02 Confirm authority and notice

Check the client's authority to provide material and the required collection or use notices. Refer sensitive-data transfers to an approved secure channel rather than asking for them in a public form.

03 Restrict use and disclosure

Use client information only for the authorised work or a lawful requirement. Share with personnel and suppliers who need it under appropriate obligations; do not publish names, screenshots or results without permission.

04 Protect transfers and storage

Select appropriate access controls, encryption and secure transfer methods for the data and service. Verify recipients and document material data flows, including international processing and vendor access.

05 Support privacy requests

Verify the requester, record the request and route it to the organisation responsible for the information. Preserve relevant records and respond according to applicable duties and the agreed processing role.

06 Handle a suspected exposure

Escalate unexpected access, misdelivery or loss through the incident process. Preserve evidence and coordinate the assessment; publication of this framework does not establish every client's legal compliance.

FROM POLICY TO DELIVERY

Operate. Record. Review.

01 Identify the data, purpose and client instructions.

02 Confirm approved recipients, locations and safeguards.

03 Handle the material with minimum necessary access.

04 Record requests, disclosures and changes to data handling.

Agree with the client

- Data categories and authorised purposes
- Hosting, processing and transfer locations
- Supplier roles and privacy notices
- Requests, retention and incident contacts

Evidence to retain

- Data-flow and access records
- Authorised disclosure and transfer history
- Privacy-request and incident records

Exceptions & review

Record the requirement, reason, affected scope, risk owner, compensating measures and expiry or review date. Seek approval before deviating, or use documented emergency authority and arrange prompt review. Exceptions cannot waive applicable legal duties.

Review trigger: When a new data flow, supplier, location or purpose is introduced and at agreed privacy reviews.

Proposed owner: NovaSoft engagement lead with the client service/risk owner. Review at least annually, and earlier when the trigger above applies. Version changes require an approval and client-impact record.

References & related information

OAIC - Australian Privacy Principles guidelines

OAIC - Privacy and commercially available AI

NovaSoft public policy library and application notes