



Main Roads Privacy Framework

OFFICIAL

Contents

1	INTRODUCTION	4
2	INFORMATION PRIVACY PRINCIPLES.....	4
3	INFORMATION	4
3.1	What is Personal information?	4
3.2	What is Sensitive Personal Information?.....	5
3.3	What is a Record?	5
4	WHAT INFORMATION DO WE COLLECT?	5
4.1	Information collected.....	5
4.1.1	Personal Information	5
4.1.2	Sensitive personal information.....	6
4.1.3	Information recorded	6
4.2	Compulsory or optional collection	6
4.3	Unique identifiers	7
5	HOW DO WE USE INFORMATION?.....	7
5.1	CCTV and Body Camera Use	7
6	WHAT INFORMATION DO WE DISCLOSE?.....	7
6.1	Information disclosure.....	7
6.2	Disclosed for Enforcement.....	8
6.3	Internet Sites.....	8
6.4	Administer Services	8
6.5	CCTV and Body Camera Disclosure	8
6.6	Third Parties or Other Entities.....	9
6.7	Third Party Disclosure.....	9
7	STORAGE AND SECURITY OF PERSONAL INFORMATION	9
7.1	Access to Records containing Personal Information	9
7.2	Alteration of Records containing Personal Information.....	9
7.3	Privacy Policy Breaches	10
8	COMPLAINTS ABOUT PRIVACY	10
9	REFERENCES AND RELATED DOCUMENTS	10
	APPENDIX 1 - WEBSITE PRIVACY STATEMENT	11
	APPENDIX 2 - STAFF PRIVACY STATEMENT.....	13

OFFICIAL

Document control

Owner	Chief Information Officer
Custodian	Information Manager
TRIM reference	D26#364121
Issue date	30 June 2026
Review frequency	Annually

Amendments

Revision number	Revision date	Description of key changes	Section / Page No.
1	June 2026	Establishment of Privacy Framework	All

OFFICIAL

1 INTRODUCTION

This Framework supports the Main Roads Privacy Policy and provides the framework for how we manage personal information and support Main Roads' ongoing commitment to maintaining the highest standards of privacy and complying with the *Privacy and Information Sharing Act 2024* (WA) (the PRIS Act) (including the Information Privacy Principles (the IPPs)).

2 INFORMATION PRIVACY PRINCIPLES

Main Roads complies with the IPPs when collecting, storing, using and disclosing personal information. In complying with the IPPs, we:

- Collect personal and sensitive personal information only where fair and reasonable and necessary for the performance of our functions.
- Use and disclose personal information only for its primary purpose, unless required or authorised, reasonably expected, consented to or otherwise permitted.
- Apply safeguards to protect personal information from misuse, loss, unauthorised access, modification or disclosure.
- Maintain accurate, complete and up-to-date personal information.
- Ensure personal information is retained, de-identified or disposed of in accordance with privacy and record keeping requirements.
- Assign and disclose unique identifiers only where lawful and necessary.
- Respond promptly and appropriately to suspected or actual privacy breaches.

3 INFORMATION

3.1 What is Personal information?

Personal Information is:

- information or an opinion, whether true or not, and whether recorded in a material form or not, that relates to an individual, whether living or dead, whose identity is apparent or can reasonably be ascertained from the information or opinion; and
- includes information of the following kinds
 - a name, date of birth or address;
 - a unique identifier, online identifier or pseudonym;
 - contact information (such as phone numbers);
 - information that relates to an individual's location;
 - technical or behavioural information in relation to an individual's activities, preferences or identity;
 - inferred information that relates to an individual, including predictions in relation to an individual's behaviour or preferences and profiles generated from aggregated information; or
 - information that relates to 1 or more features specific to the physical, physiological, genetic, mental, behavioural, economic, cultural or social identity of an individual.

OFFICIAL

3.2 What is Sensitive Personal Information?

Sensitive Personal Information is personal information:

- a. that relates to an individual's
 - i. racial or ethnic origin;
 - ii. gender identity, in a case where the individual's gender identity does not correspond with their designated sex at birth;
 - iii. sexual orientation or practices;
 - iv. political opinions;
 - v. membership of a political association;
 - vi. religious beliefs or affiliations;
 - vii. philosophical beliefs;
 - viii. membership of a professional or trade association;
 - ix. membership of a trade union; or
 - x. criminal record;
- b. that is health information;
- c. that is genetic or genomic information (other than health information);
- d. that is biometric information; or
- e. from which information of a kind referred to in any of the above can reasonably be inferred.

3.3 What is a Record?

For the purposes of this Policy, a Record includes information that is collected and stored in any form, including but not limited to:

- written or printed, including braille;
- maps, plans, diagrams or graphs;
- drawings, pictorial or graphic works, or photographs;
- anything on which there are figures, marks, perforations, or symbols, having a meaning for persons qualified to interpret them;
- anything from which images, sounds or writings can be reproduced with or without the aid of anything else; and
- anything on which information has been stored or recorded, either mechanically, magnetically, or electronically.

4 WHAT INFORMATION DO WE COLLECT?

4.1 Information collected

4.1.1 Personal Information

Main Roads only collects Personal Information necessary for Main Roads functions or activities, these may include:

- a. person's name;
- b. residential and postal address;
- c. gender and marital status;
- d. date of birth;
- e. public interest disclosure applications;
- f. telephone numbers;

OFFICIAL

- g. employment details
- h. occupation information;
- i. social media posts;
- j. cookies;
- k. insurance details;
- l. educational qualifications;
- m. government identifiers (e.g. Tax File Number);
- n. security incident details;
- o. content of email messages and email addresses of the sender and recipients.

4.1.2 Sensitive personal information

Main Roads only collects sensitive personal information necessary for Main Roads functions or activities and when required by law, consented to by an individual consent or otherwise permitted under IPP 1, this may include:

- a. health information (including drug and alcohol tests, incident reports etc);
- b. audio recordings;
- c. crash information; and
- d. closed circuit television (CCTV) video surveillance recordings.

4.1.3 Information recorded

Main Roads records the following communications for administrative, operational, management, safety, legal, security, training and quality reasons:

- a. CCTV and audio surveillance recordings;
- b. Internet usage;
- c. Telephone and email conversations to and from our operational and customer facing support services; and
- d. Online meetings.

Main Roads collects information about our Staff; this is outlined in our Staff Privacy Statement (Appendix 2).

4.2 Compulsory or optional collection

Main Roads collects information through the following mechanisms, each of these systems has different opt-in/opt out opportunities:

- Phone calls – this is recorded unless a customer requests otherwise
- Emails – this is collected unless a customer requests otherwise
- Requests for Access to systems – this is compulsory for auditing purposes
- In person – this is collected unless a customer requests otherwise
- Permit applications – this is compulsory for auditing purposes
- Online webforms – this is collected unless a customer provides anonymous data

Main Roads provides Collection Statements at each collection point.

Please see our Website Privacy Statement (Appendix 1) for further digital collections methods on our Corporate Website or online systems.

OFFICIAL

4.3 Unique identifiers

Main Roads uses unique identifiers as part of business practices where necessary to enable it to perform its functions efficiently. These unique identifiers are not used as a general identifier across unrelated systems. These identifiers are also not disclosed externally unless authorised by law, required to deliver a service, or with consent.

5 HOW DO WE USE INFORMATION?

Main Roads uses the information that is collected in the course of its functions and activities for the following purposes:

- a. deliver its transport services safely and securely;
- b. assist with communication activities for safety or operational needs;
- c. assist with transport planning activities;
- d. administering services and transactions;
- e. managing access to systems;
- f. maintaining accurate records;
- g. meeting legal or regulatory obligations; and
- h. for training and customer experience.

Personal information collected is not used for automated decision-making processes or functions.

5.1 CCTV and Body Camera Use

Main Roads may use CCTV and body camera recordings to:

- a. deliver its transport services safely and securely;
- b. assist with communication activities for safety purposes;
- c. deter, detect, prevent, investigate and respond to safety or security incidents on Main Roads properties, the road reserve and any Main Roads owned or controlled land;
- d. investigate and respond to liability claims on the road reserve and any Main Roads owned or controlled land; and
- e. investigate and prosecute breaches of law, fraudulent activities, wrongdoing or infringements on the road reserve and any Main Roads owned or controlled land.

6 WHAT INFORMATION DO WE DISCLOSE?

6.1 Information disclosure

Where Main Roads holds a record containing personal or sensitive personal information that was collected for a particular purpose, that information will not be used or disclosed for any other purpose unless:

- a. the individual concerned has consented to the use or disclosure of the information for that other purpose;
- b. the individual would reasonably expect Main Roads to use or disclose the information for the secondary purpose and the secondary purpose is:
 - i. if the information is personal Information, but not sensitive personal information – related to the primary purpose; or

OFFICIAL

- ii. if the information is sensitive personal information – directly related to the primary purpose;
- c. the use or disclosure of the information is required or authorised by or under a Western Australian or Australian law or a court/tribunal order;
- d. Main Roads reasonably believes that the use or disclosure is necessary:
 - i. to prevent or lessen a serious threat to the life, health, safety or welfare of any individual, or to public health, public safety or public welfare; or
 - ii. to investigate for suspected unlawful activities or reporting the matter to relevant persons or authorities;
 - iii. for a law enforcement function to be performed by a law enforcement agency; or
 - iv. for proceedings before a court or tribunal.
- e. Main Roads reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

6.2 Disclosed for Enforcement

Where Personal Information is used or disclosed for a law enforcement function to be performed by a law enforcement agency, or proceedings before a court or tribunal, Main Roads must make a written note of the use or disclosure with the Record.

6.3 Internet Sites

Information about use of Main Roads internet sites will only be analysed on a bulk basis for broad demographic content and individual use will not be analysed. See our Website Privacy Statement for further detail.

6.4 Administer Services

In addition to the circumstances set out in paragraph 6.1, the Main Roads may use Personal Information to administer its services to its customers, manage customer relationships, market its services, improve its services, respond to customer questions or feedback, respond to a security incident, process transactions, assist in planning and research, and send newsletters, notifications or other Main Roads information to customers.

6.5 CCTV and Body Camera Disclosure

Main Roads may disclose CCTV and body camera recordings (including images and audio) to:

- a. a law enforcement agency as part of its investigation on a suspected unlawful activity; and
- b. a court or tribunal for proceedings.

CCTV footage is to be disposed of after 30 days unless required to conduct an investigation into an incident. Before any still photographs or video footage are used in social media, all reasonable steps are taken to deidentify individuals appearing in the imagery.

OFFICIAL

6.6 Third Parties or Other Entities

Main Roads may also disclose Personal Information to the following entities:

- a. Ministers and other government departments, agencies or entities;
- b. internal and external auditors;
- c. law enforcement agencies (and their contractors) and regulators;
- d. emergency services providers;
- e. investigators and entities engaged to help identify and investigate improper activities or prevent fraud.

6.7 Third Party Disclosure

Where Main Roads discloses Personal Information to a third party, Main Roads must endeavour to ensure that the third party uses the Personal Information only for the specific purpose for which it is supplied and when required, additional consent is requested and a confidentiality agreement is in place.

7 STORAGE AND SECURITY OF PERSONAL INFORMATION

The following controls apply to the storage and security of Personal Information:

- All digital Personal Information and Records collected by Main Roads are stored in a secure server, protected by security safeguards as are reasonable in the circumstances to guard against misuse, interference, loss and unauthorised access, modification or disclosure.
- All Records are managed, retained and disposed of in accordance with the agency Record Keeping Policy and Record Keeping Plan.
- Personal and Sensitive Information are retained, stored, deleted and/or de-identified from Records either at the request of an individual or where Main Roads no longer needs it. Main Roads must take such steps as are reasonable in the circumstances.
- Where practicable, Main Roads only uses systems where data is stored within Australia, when this is not available, robust security processes and protocols are in place to ensure the safekeeping of Main Roads data.

7.1 Access to Records containing Personal Information

Where Main Roads has possession or control of a Record containing Personal Information, the individual concerned shall be entitled to have access to that Record, except to the extent that Main Roads is required or authorised to refuse to provide the individual with access to that Record under the applicable provisions of any law that provides for access by persons to documents (including the *Freedom of Information Act 1992*).

If access is refused, Main Roads will give the individual notice in writing and include the reasons for the decision to refuse access.

7.2 Alteration of Records containing Personal Information

Where Main Roads has possession or control of a Record containing Personal Information, the person responsible for that information must take such steps by way of making appropriate corrections, deletions and additions as are reasonable in the circumstances to ensure that the

OFFICIAL

Record is, having regard to the purpose for which the information is held, accurate, relevant, up to date, complete and not misleading.

This requirement is subject to any applicable limitation in a law that provides a right to require the correction or amendment of documents.

Where Main Roads is not willing to amend a Record containing Personal Information in accordance with a request by the individual concerned, the person responsible for that information must take such steps (if any) as are reasonable in the circumstances to attach to the Record any statement provided by that individual of the correction, deletion or addition sought.

7.3 Privacy Policy Breaches

Main Roads promote a workplace culture rooted in integrity and accountability, where all staff are expected to uphold the highest ethical and legal standards. Any breaches of information will be addressed appropriately as per the *Public Sector Management Act 1994* and the *Corruption, Crime and Misconduct Act 2003*.

8 COMPLAINTS ABOUT PRIVACY

For any enquiries about this policy, to request access to your personal information, or to lodge a privacy complaint, please contact privacy@mainroads.wa.gov.au

OFFICIAL

APPENDIX 1 - WEBSITE PRIVACY STATEMENT

Main Roads collects the following information when a person:

- a. visits an internet site:
 - i. the server address;
 - ii. top level domain name (for example .com, .gov, .au, .uk);
 - iii. date and time of the visit to the site;
 - iv. pages accessed and documents downloaded;
 - v. previous site visited;
 - vi. type of browser used;
 - vii. IP Organisation;
 - viii. Operating system; and
 - ix. Language
- b. uses a mobile or tablet application to visit a Main Roads internet site:
 - i. the IP address of the device;
 - ii. the location of the device; and
 - iii. the application activity.

How we collect it?

If an internet site is used to complete an online application form, Main Roads will only collect the information contained in the submitted form. If a person logs out of the internet site or cancels the application before submitting the form, the partial submission is retained for training and customer mapping purposes only.

Main Roads may use Cookies for statistical, reporting, planning, research, administration and marketing purposes and to deliver content specific to the interests of users so they do not have to register each time they use the internet site.

We use cookies to enhance your experience. You can disable cookies in your browser settings, but this may affect website functionality.

List of applications used

1. Google Analytics - Google Analytics collects statistical information about user behaviour on the website.
2. Bing Webmaster Tools – Bing Webmaster Tools collect statistical information about user behaviour on the website.
3. Meta Business Tools and Pixel - Meta Business tools collect information about user behaviour on the website.
4. Optimizely – Collect page visits, and webforms
5. Customer Voice – Microsoft Survey Tool – Collects survey submissions
6. Dynamics CRM - Collects webform and claim submissions
7. Click Dimensions - Collects webform submissions and subscriptions
8. Granicus (My Say Transport) – Collects page visits and interaction
9. My Account – Main Roads B2C Portal – Authentication tool
10. Main Roads Open Data Portal
11. Main Roads Web Applications

OFFICIAL

Collection via analytics

Main Roads receives standard analytics information from third-party providers (such as Google) only when customers choose to use their own third-party accounts. We do not access any additional information beyond the analytics data those providers supply. Customers can manage what is shared through their own account privacy settings

We use the information collected about how you use the Main Roads website and how the website performs during your visit for statistical and system administration purposes. We do this to help:

- monitor and understand usage trends to make sure the Main Roads website is meeting the needs of its users;
- understand and enhance your experience of the Main Roads website (for example, to improve content or make performance improvements);
- monitor and protect the Main Roads website from cyber security threats.

We do not use this information to identify you or match it with any other personal information we collect from you.

Use and disclosure

Personal information (provided)

The personal information you provide us through the Main Roads website will be used for the primary purpose for which it was collected. For example:

- to allow us to respond to your questions or feedback.
- where you have opted to receive a newsletter or participate in surveys.

Other use and disclosure

We will only use or disclose your personal information:

- for a purpose related to that for which it was collected if you have consented to that use or disclosure, or if you would reasonably expect the personal information would be used for that related purpose;
- where required or permitted by a law of Western Australia or the Commonwealth.

Any information we receive will at all times be dealt with in accordance with the applicable legislation in Western Australia and consistent with any legal obligation (including the State Records Act 2000).

OFFICIAL

APPENDIX 2 - STAFF PRIVACY STATEMENT

Main Roads is committed to protecting the privacy of personal information relating to its staff. We handle staff personal information responsibly, lawfully and in a way that supports trust, transparency and accountability across the organisation.

What personal information we collect

In the course of your employment or engagement, Main Roads may collect and hold personal information including, but not limited to:

- identification and contact details
- employment and payroll information
- recruitment, performance and development records
- leave, health and safety information
- information required for security, system access and compliance purposes

We only collect personal information that is reasonably necessary to manage our workforce and meet our legal, operational and governance obligations.

How we collect personal information

Personal information is generally collected directly from you through:

- recruitment and onboarding processes
- Human Resources and payroll systems
- workplace systems and applications
- forms, declarations and correspondence

In limited circumstances, information may be collected from third parties where this is authorised and appropriate (for example, pre-employment checks or mandatory reporting requirements).

How we use and disclose staff personal information

Staff personal information is used for purposes directly related to your employment or engagement, including:

- managing employment, remuneration and entitlements
- workforce planning, performance and development
- health, safety, wellbeing and workplace support
- compliance with legislative, regulatory and reporting obligations

Access to staff personal information is restricted to authorised personnel and is only shared internally or externally where there is a legitimate business need and appropriate safeguards are in place.

Secondary use and information sharing

Staff personal information will not be used or shared for new or secondary purposes unless this is lawful, necessary and appropriately authorised. Where information sharing occurs, risks are considered and decisions are documented to ensure privacy is protected.

OFFICIAL

Information security and retention

Main Roads takes reasonable steps to protect staff personal information from misuse, loss, unauthorised access or disclosure. Information is stored securely and retained in accordance with approved records management and retention requirements.

Access and correction

You may request access to the personal information Main Roads holds about you and request corrections where information is inaccurate, incomplete or out of date. Requests will be managed in accordance with internal procedures and applicable laws.

Privacy concerns or complaints

If you have concerns about how your personal information is handled, or believe a privacy breach may have occurred, you should contact the Privacy Team or your Human Resources Business Partner in the first instance. Privacy concerns and complaints are taken seriously and will be handled promptly and confidentially.