

Data transfer and privacy

As a result of recent changes to privacy legislation, and in order to adopt a best practice approach, WAN has developed new guidelines with respect to the way in which data is transferred. This primarily relates to any personally identifiable information (PII), some examples of which are:


















- Subscriber activity reports
- Upgrade campaign files
- Subscriber lists of any sort which contain personal information

The new guidelines state that we can no longer email this data between ourselves internally, or to any party externally. In response we are putting the following measures in place.

Sending Files to Distributors

There are currently 3 options that may be used to send data to you.


1. The current West Network infrastructure will be used for this purpose. Currently there are only a few regular files distributed this way. We have now developed a solution which allows adhoc files to be placed on the platform and accessed only via secure login. You will now start to see new files in the report area of your secure portal. In addition, a new, regular file will be posted each Monday; the **Subscriber End Grace** report. This report is used by distributors who have transitioned their round and wish to wrap a reminder with papers to any subscriber whose subscription will be suspended for non-payment within the next 7 days. Reminder slips are available via *West Network* under the *Resources* section or through your Area Manager.

<input checked="" type="checkbox"/>		Report Name	Report Description	Type	Favorite
<input type="checkbox"/>		SubActivity	Subscriber Activity Report		
<input type="checkbox"/>		DailyDraw	Daily Route Draw Export		
<input type="checkbox"/>		Part2Draw	Part 2 Route Draw Export		
<input type="checkbox"/>		PendingDraw	Pending Draw Report		
<input type="checkbox"/>		ThrowList	Throw List Report		
<input type="checkbox"/>		SchoolBulk	School Bulk Drops		
<input type="checkbox"/>		Distributor	Distributor Mixed Files		
<input type="checkbox"/>		SubEndGrace	Subscriber End Grace Files		

In addition, we are looking at the possibility of West Network archiving SARs and draw files for 30-60 days which would further diminish the requirement to email these files.

2. We may also use our WAN Dropbox system to send you files. In that case you will receive an email similar to the example below. You simply need to click on the link.

WANews Dropbox Fileshare [expires Saturday, 13 June 2015 4:11:00 PM]

 **Natalie Bitsounis**
to me

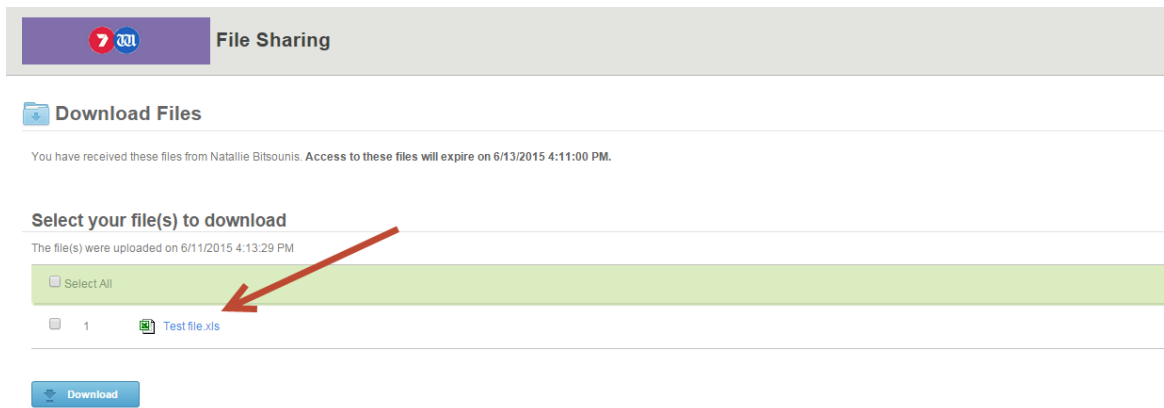
4:13 PM (0 m)

You have received access to a Dropbox File Share from Natalie Bitsounis. The link to transfer your file(s) will expire on Saturday, 13 June 2015 4:11 PM.

<https://shareit.wanews.com.au/?ShareToken=C7C2C05E41CA9D9B7C0353EDD04C329A4F3BF129>

<http://sem.thewest.com.au/>

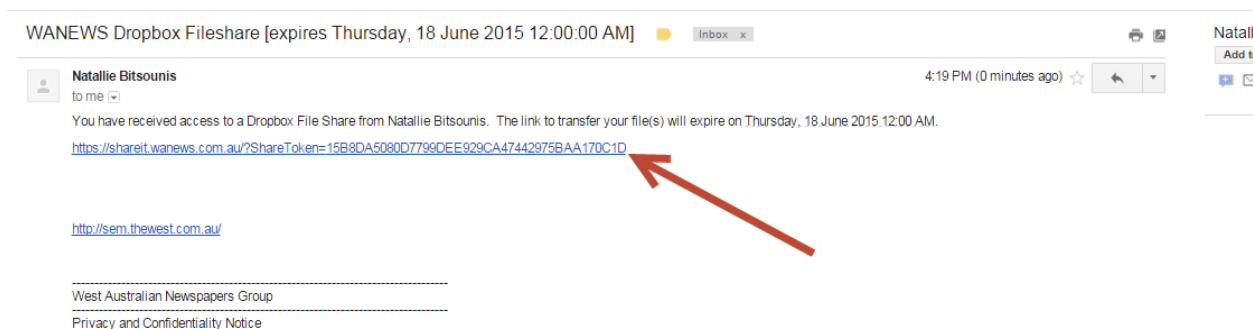
Then, click on the file in the browser window:



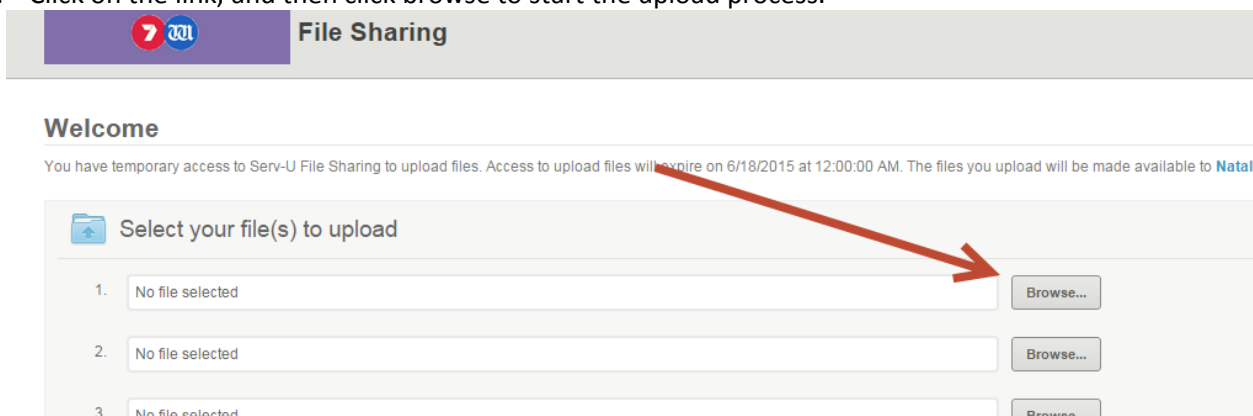
3. We may also from time to time remove PII data from a file before emailing it. This means we will delete any names and contact details before sending.

Distributor Obligations

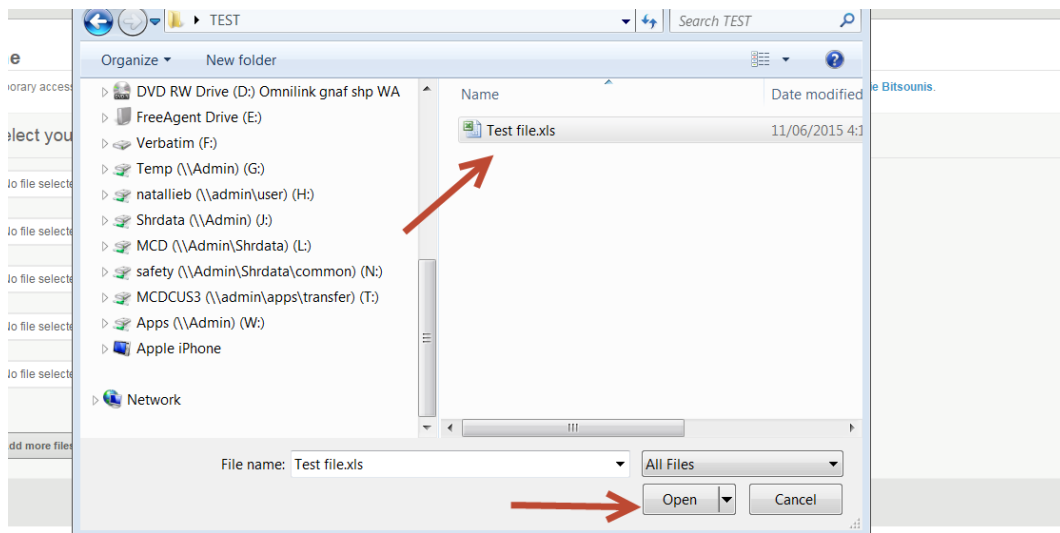
We recommend that you familiarise yourself with Privacy legislation and ensure that you equally take reasonable measures to ensure the security of records which contain PII particularly when transferring data. Should you wish to take advantage of our Dropbox system, please ask the relevant person to send you a link to upload your files. You will then receive an email that looks similar to this:



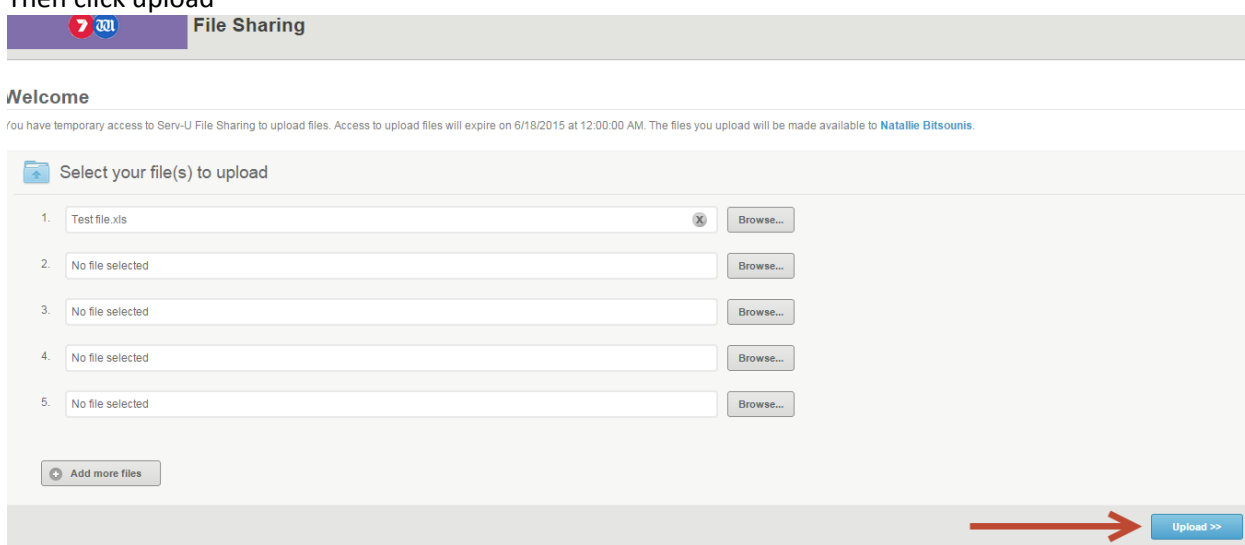
1. Click on the link, and then click browse to start the upload process.



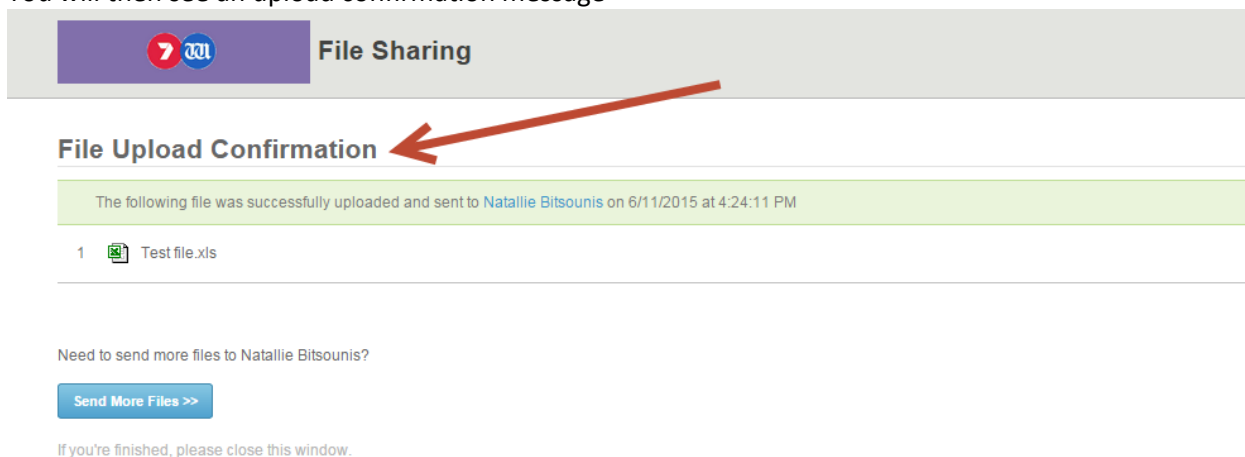
2. Browse to your file and select it, and then click open



3. Then click upload



4. You will then see an upload confirmation message



We thank you for your patience as we implement these new processes.