

Privacy Policy

Document classification	Policy – Corporate Governance
Document scope	Any individual who discloses personal information to ARIIA ARIIA Board and staff members Any third party ARIIA engages with to provide services
Supporting documents	REG002 Data Breach Register FOR002 Data Breach Assessment Report
Version	1.0
Last review	9 October 2024
Next review	October 2025 or as required to reflect changes to ARIIA privacy practices and legislative requirements.
Approved by	ARIIA Board

1. Purpose

ARIIA values and respects the privacy of all people. ARIIA is committed to protecting your privacy by upholding the [Australian Privacy Principles \(APPs\)](#) as set out in the [Privacy Act 1988 \(Cth\)](#) and other applicable privacy laws and regulations.

This Privacy Policy (**Policy**) describes how ARIIA collects, holds, uses, and discloses your personal information, and how it maintains the quality and security of your personal information. The Policy is located at <https://www.ariia.org.au/privacy-policy>.

1.1. Responsibility of the Board

The Board is responsible for:

- establishing a privacy policy;
- monitoring compliance with this policy;
- responding to any breaches; and
- reviewing and approving this policy on an annual basis.

1.2. Responsibility of the Executive Team

The Executive Team is responsible for:

- monitoring compliance with this policy;
- remedying any breaches and reporting details to the Board; and
- reviewing this policy on an annual basis to ensure that the policy is operating effectively.

2. Definitions

Personal information	<p>Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not, or as otherwise defined by applicable data protection laws.</p> <p>Sensitive information includes (for example) information about a person’s membership of a professional or trade association. ARIIA does not collect sensitive information (as defined by the Privacy Act) without consent.</p>
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3. Collection of Personal Information

To the extent required by the Privacy Act, ARIIA will not collect personal information about you unless that information is necessary for one or more of its activities. The personal information ARIIA collects about you depends on the nature of your dealings or what you choose to share with the organisation. For example, the personal information ARIIA collects about you may include:

- Your name, address, email address, phone number or contact details, along with the frequency of your enquiries if you contact ARIIA for any reason;
- Your demographic, preferences, opinions, skills, expertise in relation to the activity you are involved in with ARIIA or participation in research projects or advisory groups;
- Information about how you have used ARIIA’s website;
- How and when you use ARIIA’s services, including the technology you use to access its services;
- Your transactions with ARIIA, including any donations. Any credit card information that you provide to ARIIA is encrypted; and
- Information related to your employment at ARIIA such as your tax file number, bank account details, professional history, reference check information, your location and your access to, and use of, ARIIA’s equipment and infrastructure (such as IT networks) and your photograph or video recording (e.g., identity card, meeting capture, CCTV footage, etc.).

When ARIIA collects personal information directly from you, it will take reasonable steps at or before the time of collection to ensure that you are aware of certain key matters, such as the purpose for which ARIIA is collecting the information, the organisations (or types of organisations) to which ARIIA would normally disclose information of that kind, the fact that you are able to access the information and how to contact ARIIA.

ARIIA is committed to safeguarding all payment card data it receives. This will be masked or encrypted after payments have been processed. Where ARIIA collects information about you from a third party, it will take reasonable steps to ensure that you have consented or have been made aware of the details as set out above.

Similarly, ARIIA may be required to provide your contact details to third party suppliers of services which you would reasonably expect it to do in order to provide its services.

You do not have to provide ARIIA with your personal information. However, ARIIA's ability to provide services to you may be affected if you do not provide your personal information, or if you withdraw any consent.

4. Use and disclosure of your Personal Information by ARIIA

ARIIA uses personal information for many purposes in connection with its activities and functions, including the following purposes:

- To provide you with information or services that you request from ARIIA;
- To deliver to you a more personalised experience and service offering;
- To improve the quality of the services ARIIA offers;
- For internal and funder reporting;
- For internal administrative purposes; and
- For marketing and research purposes.

If ARIIA uses or discloses your personal information for a purpose (secondary purpose) other than the main reason for which it was originally collected (primary purpose) to the extent required by the Privacy Act, it will ensure that:

- The secondary purpose is related to the primary purpose and you would reasonably expect that ARIIA would use or disclose your information in that way;
- The use or disclosure is required or authorised by or under law; and
- The use or disclosure is otherwise permitted by the Privacy Act.

In performing its activities and functions (such as for conferences, presentations, and events as outlined above), ARIIA may need to disclose personal information to third parties where you may reasonably expect ARIIA to use or disclose the personal information for a specific purpose.

4.1. Transfer of personal information overseas

Some of the third-party service providers ARIIA discloses personal information to may be based in or have servers located outside of Australia. Where it discloses your personal information to third parties overseas, it will take reasonable steps to ensure that data security and appropriate privacy practices are maintained. ARIIA will only disclose to overseas third parties if:

- You have given ARIIA your consent to disclose personal information to that third party; or
- ARIIA reasonably believes that:
 - The overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the APPs; and
 - The law or binding scheme can be enforced; or
 - The disclosure is required or authorised by an Australian law or court/tribunal order.

4.2. Online Activity

For each visitor to ARIIA's website or social media site or e-news, it may collect the following type of information for statistical purposes:

- Number of users who visit;
- Date and time of the visits;
- Pages accessed;
- User's top-level domain name (for example .com or .gov);
- Previous site visited;
- Type of browser used;
- Type of device used, users' operating system (such as Windows or Macintosh); and
- Website or mobile device activity;

4.3. Cookies

The ARIIA website uses cookies (a small file of letters and numbers a website puts on your device if you allow it). These cookies recognise when your device has visited ARIIA's website(s) before, so it can distinguish you from other users of the website. This improves your experience, and the helps improve the ARIIA website. However, it does not use cookies to identify you, just to improve your experience on its website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and ARIIA's website's functionality may be affected. These cookies are not used to collect, store, track or monitor any personal information.

4.4. Website Analytics

As would reasonably be expected, ARIIA may collect website and mobile device (e.g., apps) statistics (which includes pages accessed and search terms used) but this information is not identifiable (i.e. ARIIA cannot tell who you are). ARIIA may also use Google Analytics (or other third-party vendor) demographics and interest reporting (such as what country you are from, what language your computer is set to, age group, gender, and interest area).

This is anonymous statistical data, and no attempt will be made to identify users. ARIIA uses this data to evaluate its website and to improve the content it displays to you.

4.5. Direct Marketing and Remarketing

ARIIA may send you direct marketing communications and information about its services, opportunities, or events that it considers may be of interest to you if you have requested or consented to receive such communications. These communications may be sent in various forms, including mail, SMS, and email, in accordance with applicable marketing laws, such as the [Australian Spam Act 2003 \(Cth\)](#). If you indicate a preference for a method of communication, ARIIA will endeavour to use that method whenever practical to do so.

ARIIA may use Google AdWords, Facebook Pixel, and other third-party vendor remarketing tools to advertise trigger ads across the internet. AdWords (and other vendors) remarketing will display relevant ads tailored to you based on what parts of the ARIIA website you have viewed by placing a cookie on your machine and/or use Facebook Pixel or Google Tag Manager technology (using your internet browser).

This cookie does not in any way identify you or give access to your computer. The cookie or similar technology is used to say: "This person visited this page, so show them ads relating to that page." Google AdWords (or other third-party vendor) remarketing allows ARIIA to tailor its marketing to better suit your needs and only display ads that are relevant to you.

You may opt-out of receiving marketing communications from ARIIA at any time by following the instructions to "unsubscribe" set out in the relevant communication or contacting ARIIA using the details set out in the 'Contacts' section below.

4.6. Links to third-party sites

ARIIA website(s) may contain links to websites operated by third parties. If you access a third-party website through ARIIA's website(s), personal information may be collected by that third-party website.

ARIIA make no representations or warranties in relation to the privacy practices of any third-party provider or website and it is not responsible for the privacy policies or the content of any third-party provider or website. Third-party providers/websites are responsible for informing you about their own privacy practices and ARIIA encourage you to read their privacy policies.

5. ARIIA's Responsibilities under the GDPR

For European Union (EU) residents that engage with ARIIA, because it collects, uses, and stores your personal information to enable it to provide you with its goods and/or services, it is a “collector” under the [GDPR](#). As such, it has certain obligations under the GDPR when collecting, storing, and using the personal information of EU residents. If you are an EU resident, your personal data will:

- Be processed lawfully, fairly and in a transparent manner by ARIIA;
- Only be collected for the specific purposes ARIIA has identified and will not be further processed in a manner that is incompatible with the purposes it has identified;
- Be collected in a way that is adequate, relevant, and limited to what is necessary in relation to the purpose for which the personal information is processed;
- Be kept up to date, where it is possible and within ARIIA's control to do so. Please let ARIIA know if you would like it to correct any of your personal information, by sending an email to ariia@ariia.org.au;
- Be kept in a form which permits ARIIA to identify you, but only for so long as necessary for the purposes for which the personal data was collected; and
- Be processed securely and in a way that protects against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

ARIIA also applies these principles to the way it collects, stores, and uses the personal information of all non- EU contacts. Specifically, it has the following measures in place, in accordance with the GDPR:

- **Erasure:** You can ask ARIIA to erase your personal information in certain circumstances such as when you withdraw your consent and ARIIA otherwise has no legal reason to retain it.
- **Restrictions of processing:** You may ask ARIIA to limit the processing of your personal information where you believe that the personal information that ARIIA holds about you is wrong (to give ARIIA enough time to verify if the information needs to be changed), and you request ARIIA to restrict the processing of personal information rather than it being erased.
- **Data portability:** You can, in some circumstances such as where ARIIA is processing your information with your consent, receive some personal information you have given ARIIA in a structured, commonly used and machine-readable format and/or ask ARIIA to transmit it to someone else, if technically possible/feasible.
- **Right to object:** You can withdraw your consent (but ARIIA may be able to continue processing without your consent if there is another legitimate reason to do so).
- **Right to complain:** You can lodge a complaint with the relevant European data protection authority if you think that any of your rights have been infringed by ARIIA.

If ARIIA refuses any request you make in relation to your personal information rights, it will write to you to explain why and how you can make a complaint about its decision.

6. Data Quality and Security

ARIIA aims to safeguard your information to the best of its abilities, through a combination of technical, administrative, and physical measures. This includes the use of Secure Socket Layer (SSL) encryption to protect information transmitted across the internet.

All personal information collected by ARIIA will be retained as part of a database, which will be securely monitored and maintained by Flinders University or an approved host, which to the best of its knowledge is based in Australia. If ARIIA stores personal information with a “cloud” service provider, the provider may be situated outside Australia.

ARIIA will take all reasonable steps to protect the security of the personal information that it holds. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

However, if you have reason to believe that your interaction with ARIIA is no longer secure (for example, if you feel that your online account has been compromised), please contact ARIIA by phone: +61 08 7421 9134 or email ariia@ariia.org.au or write to ARIIA at:

Chief Executive Officer

ARIIA

Level 2, Flinders University at Tonsley

South Road, Tonsley SA 5042.

Please note that some third-party platforms that you might use to engage with ARIIA (for example, LinkedIn, Twitter, Facebook and Instagram) are not under ARIIA’s control. If you have concerns about using these platforms, ARIIA encourages you to carefully consider their terms and conditions and other relevant policies.

ARIIA permits your details to be accessed only by authorised personnel, and it is a condition of employment that its employees maintain the confidentiality of personal information.

Payment security of all financial transactions is maintained by ARIIA using EFT and other online technologies. It is ARIIA’s policy to ensure that all financial transactions processed meet industry security standards that ensure payment details are protected. If you are concerned about sending your information over the internet, you can contact ARIIA by mail, email, or telephone.

7. Data Breach Response Plan

The Data Breach Response Plan is to enable ARIIA to contain, assess and respond to a data breach in a timely fashion and to mitigate potential harm to affected individuals.

A data breach occurs when information held by ARIIA is lost or subjected to unauthorised access, modification, disclosure, or other misuse or interference. Data breaches involving personal information that are likely to cause individuals to be at serious risk of harm must be reported to the affected individual(s) and the Australian Information Commissioner in accordance with the requirements of the Notifiable Data Breaches (**NDB**) scheme.

Data breaches may arise from: loss or unauthorised access, modification, use or disclosure or other misuse; malicious actions, such as theft or “hacking”; internal errors or failure to follow information handling policies that cause accidental loss or disclosure; and not adhering to the laws of the states and territories or the Commonwealth of Australia.

When a data breach has occurred or is suspected to have occurred, ARIIA will initiate the following process. However, it should be noted that there is no single method of responding to a data breach and in some cases the following steps may need to be modified. Data breaches must be dealt with on a case-by-case basis, by undertaking an assessment of the risks involved, and using that risk assessment to decide the appropriate course of action.

7.1. Suspected or known data breach

When an ARIIA employee or contractor becomes aware or suspects that there has been a data breach, they will notify their manager who will assess the risk, document the event and report in the first instance to the Chief Executive Officer (CEO). The CEO will:

- Include details of the suspected breach in a data breach register that will contain a brief description of the nature of the breach, how it occurred, the date of the breach, the date of discovery and the date of notification to ARIIA (for an external breach);
- Notify ARIIA’s Board via a Data Breach Risk Assessment Report to determine ARIIA’s response and remedial actions to take to contain the breach, which may include:
 - If the breach is the result of an ICT security incident (i.e., an event that affects the confidentiality, integrity or availability of ARIIA’s information, systems and infrastructure), notify ARIIA’s IT service provider to implement a response;
 - Stopping the unauthorised practice;
 - Recovering records;
 - Shutting down the system that has been breached;
 - Revoking or changing computer access privileges;
 - Addressing weaknesses in physical or electronic security.

7.2. Notification and Review

The CEO will submit a Data Breach Risk Assessment Report to the ARIIA Board and will coordinate notification (if required) of affected individuals, and/or the Australian Information Commissioner.

8. Retention of Personal Information

ARIIA will not keep your personal information for longer than it needs to. Where information held by ARIIA is no longer required to be held, and the retention is not required by law or for record-keeping obligations, then it will de-identify or destroy such personal information by secure means. In most cases, this means that ARIIA will only retain your personal information for the duration of your relationship with the organisation.

9. Access and Correction of Your Personal Information

ARIIA will endeavour to keep your personal information accurate, complete, and up to date. If you wish to make a request to access and/or correct the personal information ARIIA holds about you, you should make a request by contacting ARIIA and it will follow the procedure outlined below:

- ARIIA has its Privacy Policy available on its website and can also provide a hard copy version upon request. If you would like more information or a hard copy, please contact ARIIA using the information under 'Contacts'.
- ARIIA will make available for inspection, free of charge, all personal information, based on the information supplied by the individual that it holds in relation to an individual, provided reasonable notice is given. In the event that such a request is made, ARIIA will review its records to determine what personal information is held and endeavour to respond to your request within 30 days.
- Please note that ARIIA will request that identification is provided before personal information is released. In the event that any part of the personal information that the individual inspects is determined to be incorrect and requires alteration, then ARIIA will make such alteration in compliance with the corrected advice provided by the individual.

9.1. Opting Out

Subject to the above, where you have consented to receiving communications from ARIIA, your consent will remain current until you advise the organisation otherwise. However, you can, at no cost, opt out at any time by contacting ARIIA using the information under 'Contacts'.

10. Contacts

For more information about this policy, contact ARIIA by:

Phone: +61 08 7421 9134

Email: ariia@ariia.org.au

Address: Level 2, Flinders University at Tonsley, South Road, Tonsley SA 5042.

For further information on privacy and the Privacy Act, refer to the Office of the Australian Information Commissioner's website: www.oaic.gov.au