

# **Privacy Policy**

# April 2023

Category:	Legal	
Status:	: Draft	
Version: 2.0		
Approval Date: 11 April 2023		
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### **Privacy Policy**

This document is the Internet Association of Australia Ltd Privacy Policy (**Privacy Policy**). In this Privacy Policy, "we", "our" and "us" are all references to the Internet Association of Australia Ltd (**IAA**) ACN 168 405 098 of PO Box 8700, Perth Business Centre WA 6849.

If you have any queries related to this Privacy Policy, please contact us at <a href="mailto:privacy@internet.asn.au">privacy@internet.asn.au</a>.

### Our obligations and commitment

We understand the importance of your privacy and are committed to protecting you and your data safe. We are committed to complying with our privacy obligations in accordance with all applicable Australian laws, including the Australian Privacy Principles (**APPs**) contained in Schedule 1 to the *Privacy Act 1988* (Cth) and Part 13 of the *Telecommunications Act 1997* (Cth).

You are under no obligation to provide any information requested by us. However, refusal to provide us with information we reasonably require, or providing us with erroneous information may mean we are not able to provide you with the relevant service.

By providing any personal information to us (either directly or via your internet enabled device), you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy. You may withdraw your consent at any time by emailing us at <a href="mailto:privacy@internet.asn.au">privacy@internet.asn.au</a>.

### Collection of your personal information

#### Who we collect personal information from

As a provider of telecommunications products and services, we collect personal information from:

- our members and their representatives
- attendees of our events
- candidates seeking employment
- suppliers, subcontractors or distributors
- general browsers of our website
- industry professionals



#### Kinds of personal information we collect

The kinds of personal information we collect may include:

- Identity and contact information (personal and/or business) such as names, email address, mailing address and phone numbers
- Limited sensitive information pertaining to your health if required for the purposes of IAA events
  - Where we require sensitive information, we will seek your consent prior to collecting or using your sensitive personal information
- Technical information including browser type and operating system information, IP address, pages accessed, documents downloaded, amount of data transferred, and date and time of access
- Financial and credit information such as credit history for corporate members (corporate entity only)
  - We do not collect nor hold credit card or bank account details. All payment is managed through third-party service providers for your safety
- Photographs or videos such as at events
- Membership registers in accordance with the Corporations Law 2001 (Cth) which may include personal information of professional members

#### How we collect your personal information

We may collect your personal information when you give it to us, via our technologies, or from third-parties.

Personal information you provide to us:

- in person, or via phone, email or instant messaging service
- registration to our portal
- registration to our event
- filling out a form or survey
- making a service order
- application for employment



#### **Technologies**

access logs created by web servers

#### Third-parties

- your employer if you are an employee of a corporate member and your organisation has a corporate subscription to our portal
- an IAA event attendee has listed you as an emergency contact
- someone else has registered you as a guest for one of our events
- you are listed as a referee
- a third-party has passed on your contact details for another reason

### What we do with your personal information

#### Use

- <u>Provision of services</u> we may use your personal information to provide our services, or in relation to one of our other functions as an association. This includes operation and maintenance of our exchange network, fulfilling service orders, providing access to our portal, maintaining our website, running events, and our public policy work.
- <u>Communication</u> we may use your contact details to communicate with you. This includes sending you our newsletter, event reminders and details, surveys, enquiries or responses to your enquiries, or in relation to our recruitment process. If you are on our mailing list used for newsletters and events, you may unsubscribe at any time.
- Social media and other marketing we may use your personal information in our social
  media and other marketing. This may include photographs of our events that you
  attended, or if you are a guest speaker at one of our events or in relation to a newsletter
  article. As photographs and videos are capable of being sensitive personal information, we
  will seek your consent to being included in our photos or videos at our events, including
  your consent to use such photos and videos in our social media and marketing.
- <u>Development and maintenance</u> we may use your personal information to help us maintain and improve our services and manage the security of our networks. This may include implementation of feedback you have provided us or by analysis of your technical information that we automatically collect in accordance with this Privacy Policy. In general, this is conducted through aggregation and de-identification where possible or practicable to do so.



• <u>Compliance</u> – we are required by law to collect, retain and intercept certain types of data. Further information is provided below.

#### **Disclosure**

We may share your personal information with other parties outside of IAA. This may include sharing your personal information with third-party service providers. Some of these providers or their affiliates and entities may be located outside of Australia.

Where we do share your personal information, it will only be in connection with one or more of the reasons for our use of your personal information listed above, in seeking legal advice, where you have given us consent, where you would reasonably expect us to share your personal information or where we are permitted or required to do so by law.

We also use our best endeavours to ensure that third-parties to whom we disclose your personal information will safeguard the protection of that information.

#### **Legal obligations**

The *Telecommunications Intercept and Access Act* (**TIA**) may require us to disclose the data that we retain to law enforcement agencies in certain circumstances.

Under the TIA, we may also be required to intercept the content of communications made on our networks. The types of data that may be intercepted on our network include peering traffic and traffic source, limited to the parties present on our exchange network and interception of our wholesale Internet transit service.

#### **Storage and security**

Personal information we collect is primarily stored in electronic format and kept in databases owned and operated by ourselves, or owned and operated by our service providers. We may keep hard copies of records containing your personal information in very limited situations.

While no method of electronic storage or transmission is 100% secure, we use our best endeavours to ensure the protection of our facilities, network, and systems, including your personal information. This includes a combination of technical solutions and security practices and internal processes.

### How you may access your personal information

To ensure that we only obtain, collect, use and disclose accurate, complete and up to date personal information, we encourage you to inform us of any changes to your personal information that we collect and hold, or if the information is otherwise incorrect or erroneous. If you are a



member, we encourage you to regularly review and update your personal information in our portal as required. You are not required to pay a fee to submit a request or to change your personal information.

You may request access to the personal information we hold about you in writing by email or letter:

The Privacy Officer
Internet Association of Australia
PO Box 8700, Perth Business Centre WA 6849
<a href="mailto:privacy@internet.asn.au">privacy@internet.asn.au</a>

We may charge a small administrative fee for providing access to your personal information.

### **Complaints**

If you wish to make a complaint regarding our privacy practices, please contact us by email or letter at:

The Privacy Officer
Internet Association of Australia
PO Box 8700, Perth Business Centre WA 6849
<a href="mailto:privacy@internet.asn.au">privacy@internet.asn.au</a>

We will use our best endeavours to resolve the complaint within 10 business days following the receipt of your complaint. This may include working with you on a collaborative basis to resolve the complaint or us proposing options for resolution.

If you are not satisfied with the outcome of a complaint, you may refer the complaint to the Office of the Australian Information Commissioner (OAIC). Please refer to the <u>OAIC website</u> for information on how you may lodge a complaint.



# **Change History**

Version	Date	Nature of Change
1.0	13 October 2017	Initial document approved
1.1	18 November 2021	Updated template
		Updated Inc to Ltd
2.0	18 April 2023	Updated policy in accordance with APP1 following IAA no
		longer being exempt as a 'small business'