

ASBA Limited Policy 12.01

Privacy Policy

1. Purpose

The purpose of this document is to set policy for the use of personal information by the Association of Business Administrators Limited ('ASBA').

2. Objective

ASBA only collects, holds, uses and discloses personal information to carry out our primary goals to promote high quality professional development opportunities, enable collegial networking, be a leader in governance championing, and support other educational bodies with advocacy and support for the education sector.

3. Scope

This policy applies to all personal information held and/or collected by ASBA.

4. Collection of personal information

ASBA collects personal information for the purposes stated in this Policy from our members, non-members, participants in our events, third parties, service providers, suppliers, contractors, consultants, sponsors and individuals who interact with ASBA. individuals who interact with ASBA.

4.1. Direct collection

Membership

ASBA collects and holds information from Members about their membership or prospective membership from membership applications. This information includes name and contact details, gender and career history. Date of birth is also collected to enable ASBA to uniquely identify members and to assess what products and services may be most suitable and of interest to members.

Information from prospective members may be kept when they start, but do not complete, an online membership application form to enable us to contact them about becoming a member.

Education and training

ASBA collects and holds enrolment information from members and non-members and may keep a record of the courses completed.

Events

ASBA collects and holds information which members and non-members provide through applications to attend events such as conferences and briefings. This includes, if applicable:

- Sensitive information such as dietary or mobility requirements
- Travel bookings

- Image (video or photographs) or sound recordings (but only if the member has not opted-out from this).

ASBA also keeps a record of the events and workshops a member or non-member has attended.

Surveys

From time to time, ASBA or ASBA's service providers may collect personal information via surveys. This personal information will only be used for analytical purposes, updating records or to assist with improvement or development of products and services. By completing these surveys, members accept that their personal information may be transferred outside Australia.

4.2. Indirect collection

Membership

ASBA collects information indirectly about members, but only in circumstances where a member would reasonably expect it, or where the member has consented. Examples include referee comments for some membership applications.

Notice where third party information is provided

If personal information about any other individuals (e.g. guests attending a conference or other event) is provided by a member, ASBA will ask that the member tells the individual that this information has been passed on and make them aware of this Policy.

4.3. Use of personal information

ASBA uses personal information it collects and holds through membership, educational and training course and event applications or attendance to:

- Administer and meet member requirements for the particular service, course event or program
- Help improve the particular service, event or program
- Identify and analyse member and non-member activities and interests in order to better meet member needs and attract new members
- Enable targeted marketing communications to members and non-members
- Enable ASBA to further its mission.

ASBA will not use personal information for any purpose which a person would not reasonably expect unless it is consistent with the Privacy Act. If it is considered that a member may not expect a particular use of information held about them, consent will be requested before it is used for that purpose.

Sound and image recordings of events

ASBA uses sound and image recordings of our events to enable us to improve our events, and for promotional purposes. Members will be given a chance on application to participate in an event to indicate if they do not wish to include their voice or image. You can also contact ASBA to express a preference.

Marketing communications

ASBA's advertising and marketing material, content, information and communications (marketing material) is sent to members and non-members about whom we hold

records to provide information about ASBA's products and services which may be of personal and/or professional benefit. These products or services may extend beyond those provided by ASBA and include offers from third parties.

ASBA may send any of these marketing materials by mail, telephone, email, SMS or other electronic methods, such as through social media or targeted advertising. If a preference for a method of communication is indicated, ASBA will try to use that method where it is practical to do so.

4.4. Disclosure (sharing) of personal information

Sensitive information

ASBA only discloses sensitive information such as health information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect.

Events

ASBA may disclose the name, title and post nominal of event participants to speakers, organisers, hosts or facilitators under strict conditions to enable them to carry out their role in relation to an event, for example, to organise table lists, or facilitate introductions. ASBA may also disclose this information to sponsors and potential sponsors to enable them to assess whether or not to sponsor an event and disclose this to providers of special member offers from time to time under strict conditions.

Publications

ASBA discloses information about members to other members via ASBA publications – for example, about new members or the completion of a course in *Associate*.

Contractors and partners

ASBA may disclose personal information to contracted service providers who assist us with a number of our functions and services including service providers of technology, data processing, secretariat, legal, accounting, business consulting, auditing, archival, delivery, banking, payments, market research, content production and mailing but only for the purpose of fulfilling those services.

Where authorised or required by law

As authorised by the *Privacy Act*, ASBA may disclose personal information in connection with law enforcement activities by enforcement bodies, for example, Australian Securities and Investments Commission investigations or other investigations into suspected fraud or unlawful activity.

We are required by the *Corporations Act 2001 (Cth)* to allow an individual to inspect ASBA's member register and view current and past members' names and addresses. However, the *Corporations Act* prohibits the individual from using the information gained to contact or send material to members, and from using it for other prescribed purposes.

Overseas disclosure

From time to time, ASBA may send personal information overseas. Where ASBA uses a service provider that hosts personal information in other countries, steps will be taken that are reasonable in the circumstances to ensure that the host does not breach the Australian Privacy Principles. The steps taken may include:

- Adding provisions to the contract with the service provider that require them to protect the personal information they hold; and
- When choosing a service provider, including in considerations the privacy law or scheme (if any) that applies in the country in which the service provider operates.
- If ASBA has consent, or the overseas recipient is located in a country whose privacy laws are the same or substantially similar to those of Australia, ASBA will comply with the Australian Privacy Principles when disclosing personal information to that overseas recipient.

If a privacy breach occurs that involves a service provider located outside Australia, ASBA will support and work with members or non-members in handling the breach.

4.5. Our website, emails, apps and social media

Our website

Upon visiting the ASBA website or downloading, accessing or registering to use the website, (which may also include the use of any of our products, services or apps) ASBA may collect personal information such as name, address, email address, phone number, date of birth, username, password and other information.

The ASBA website may contain links to other sites. ASBA is not responsible for the privacy practices or policies of those sites.

Emails

Any email sent to the website will be recorded automatically by our e-mail messaging system for the purpose of replying to the e-mail. However, for normal communication with a member, ASBA will use the e-mail address provided in their membership application/renewal.

When ASBA sends members emails or other electronic messages, information is recorded about member interactions with the email including when and where it is opened and clicking on particular links.

This helps ASBA to better understand what information is of interest to you and to improve the content.

Social media

ASBA participates in social media such as LinkedIn. Social media services also handle personal information for their own purposes. These sites have their own privacy policies. ASBA is not responsible for the privacy practices or policies of those sites and it is suggested that these policies be reviewed.

Data Breaches

In the event of a data breach or a suspected data breach, ASBA will enact its Data Breach Response Plan. Where a data breach could lead to a risk of harm to affected individuals, ASBA will conduct a reasonable and expeditious assessment of the circumstances and report the data breach to the relevant authorities as is required by the Privacy Amendment (Notifiable Data Breaches) Act 2017.

4.6. Security of personal information

ASBA regularly assesses the risks of misuse, interference, loss, unauthorised access, modification or disclosure of personal information to ensure that adequate measures, including policies, procedures and technology are in place to address those risks.

4.7. Retention of personal information

We retain information about members while they maintain their membership and non-members for the period in which they attend an event.

4.8. Access to and the accuracy of personal information

Members have a right to ask for access to the personal information held about them. Unless there is a lawful reason not to, access will be given and the member allowed to correct any incorrect information.

Members will be asked to verify their identity to ensure information is not given to the wrong person. If access to personal information is not given or ASBA refuses to correct the information, ASBA will tell the member why. The member may ask that a note of the requested correction be located alongside information ASBA has not agreed to correct.

5. Requests for access and complaint resolution mechanism

In the event that there is a question, concern or complaint regarding the way in which ASBA handles personal information, contact our Privacy Officer direct at:

ASBA Limited Chief Executive Officer

Email: ceo@asba.asn.au

ASBA takes privacy concerns seriously. Where you express any concerns that we have interfered with your privacy, or seek access to information about you that we hold, we will respond within 48 hours to let you know who will be handling your matter and when you can expect a further response.

If you are unsatisfied with our response you can complain to the Office of the Information Commissioner Telephone: 1300 363 992. Email: enquiries@oaic.gov.au

6. Review of policy

ASBA will amend this Policy from time to time and notify of any amendments through our publications and by posting an updated version on our website at <http://www.asba.asn.au>.

Any amendments to this Policy will be effective immediately upon being posted to our website. Use of our website, products or services following such amendments represents acceptance to be bound by the Policy, as amended.

Suggestions about improving this Policy are welcomed. Please contact us at www.asba.asn.au should you wish to provide feedback.

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12.0	16-Aug-16	1608/12
12.01	22-Mar-19	1903/11