

Privacy Policy

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Introduction:

The Australasian Fire and Emergency Service Authorities Council Limited (**AFAC**) is committed to responsible privacy practices and complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).

Objective and Scope:

This Privacy Policy (**Policy**) sets out how AFAC complies with its obligations under the Privacy Act and how AFAC collects, uses, stores, manages, and discloses personal information, including sensitive information.

From time to time AFAC may amend this Policy at its discretion, and in accordance with any changes to legislation.

A copy of this Policy is available from our website at www.afac.com.au, or you can request a copy by contacting us at the details below..

In this Policy, 'we' and 'us' refers to AFAC and 'you' refers to any individual about whom we collect personal information.

This Policy applies to AFAC staff, AFAC Members and their personnel as well as partners and stakeholders and those people who choose to access AFAC information and services.

Policy Statements:**1 TYPES OF INFORMATION COLLECTED BY AFAC**

1.1 From time to time AFAC will collect and use personal information.

The types of personal information collected by AFAC will vary depending on the circumstances, but will typically include:

- a) your name, email, postal address and other contact details;
- b) your professional details; and
- c) any additional personal information you provide to us, or authorise us to collect as part of your interaction with AFAC;

- 1.2 We collect personal information when recruiting personnel such as your name, contact details, qualifications and work history.
- 1.3 We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions (for example, positions which involve working with children).

2 COLLECTION OF PERSONAL INFORMATION

- 2.1 We will provide a notification to you in accordance with the APPs when we collect personal information as soon as practicable.
- 2.2 AFAC collects personal information where it is reasonably necessary for or directly related to our functions or activities.
- 2.3 We collect personal information to:
 - a) provide products and/or services to an individual;
 - b) receive products and/or services from a company or individual;
 - c) contact an individual;
 - d) consider employment applications and manage employee relations;
 - e) respond to concerns, complaints or issues raised by an individual to or about AFAC;
 - f) allow AFAC to conduct its business, activities and operations;
 - g) to provide information to AFAC Members;
 - h) to provide information to contractors, and other service providers engaged by AFAC to deliver or provide goods and services or to otherwise act on behalf of AFAC; and
 - i) provide newsletters, updates or subscription services to individuals based on:
 - i. AFAC activities;
 - ii. access to research;
 - iii. business operations;
 - iv. conferences and events;
 - v. participation in forums and collaborative projects;
 - vi. participation in groups and committees; or
 - vii. training resources.
- 2.4 AFAC generally collects personal information directly from you through written forms completed. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person.
- 2.5 From time to time, where necessary and with consent, AFAC may also collect information from third parties, such as from an individual's employer or nominating organisation (such as for conference, event attendance or committee members).

2.6 AFAC may collect or receive personal information from third parties, such as from AFAC Members, joint venture partners, so that AFAC can conduct its business, including conducting conferences and events.

2.7 When AFAC receives unsolicited information from third parties it will check that the information is reasonably necessary for AFAC functions, activities and operations. If it is, that information will be handled in accordance with this Policy and we will take reasonable steps to notify you of the collection. If not, AFAC will contact you to obtain consent to hold the information or destroy or de-identify the information in accordance with the Privacy Act.

3 USE AND DISCLOSURE OF PERSONAL INFORMATION

3.1 AFAC will only use or disclose information for the primary purpose for which it was collected or for a directly related secondary purpose which the individual would reasonably expect AFAC to use or disclose for the secondary purpose, and only in accordance with the APPs.

3.2 AFAC may disclose personal information such as contact details for persons who participate in group activities or research or belong to a special interest group on the AFAC website with the individual's consent.

3.3 Occasionally, AFAC may use or disclose personal information for the purpose of direct marketing to an individual where it is permitted by law or an individual has given their consent.

3.4 Direct marketing involves communicating directly with an individual to promote products, services, conferences and events from AFAC or AFAC contractors, event exhibitors, sponsors or partners. AFAC may employ a range of delivery methods – such as SMS, email, mail or telephone. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below. If you opt-out of receiving marketing material from us, we may still contact you in relation to our ongoing relationship with you.

3.5 An individual also has the option of not identifying themselves to AFAC or by using a pseudonym. However, this may result in AFAC not being able to provide you with requested products or services and it may mean that you cannot participate in some AFAC activities.

3.6 AFAC reserves the right under the APPs to seek the identity of an individual if it is in accordance with the law or a determination of a court or if it is impractical for AFAC to provide services to or deal with the individuals.

4 TO WHOM DOES AFAC DISCLOSE PERSONAL INFORMATION

4.1 AFAC may disclose personal information to third parties in accordance with this Policy and the Privacy Act in connection with the purposes described above.

4.2 This may include disclosing an individual's personal information to the following types of third parties, including but not limited to:

- a) Fire, land management and emergency service agencies – these agencies are also bound by the Privacy Act or other similar legislation.
- b) AFAC contractors, including IT providers, telecommunication services, event or conference organisers or contractors, mailing operations;
- c) AFAC's accountants, lawyers and insurers and auditors;
- d) AFAC's sponsors or advertisers under current or future agreements;
- e) AFAC's partners under current or future agreements, including but not limited to Australian Institute for Disaster Resilience, Bushfire Natural Hazards CRC, Red Cross and Hannover Fairs Australia;
- f) any third parties an individual has directed or permitted AFAC to disclose their personal information to;
- g) third parties that require the information for law enforcement to or prevent a serious threat to life, health or safety of an individual or the public; or
- h) as otherwise permitted by law.

4.3 Where AFAC discloses personal information to third parties it will use reasonable efforts to ensure that such third parties only use the personal information as reasonably required for the purpose it was disclosed to them and in a manner consistent with this Policy and the APPs. AFAC's efforts will include, but not be limited to, suitable privacy and confidentiality clauses in agreements with third parties to whom AFAC discloses personal information.

5 DOES PERSONAL INFORMATION LEAVE AUSTRALIA?

5.1 AFAC is a national organisation that works with agencies, service providers, AFAC partners and third parties across Australia and the globe.

5.2 AFAC may disclose personal information, such as an individual's name, to a fire management organisation regarding resource sharing between Australia and the other country.

5.3 The countries in which these third parties are located will vary. In the course of business AFAC may disclose personal information to parties located around the world including, but not limited to, New Zealand, the Pacific Islands, and others.

5.4 Unless we have your consent, or an exception under the APPs applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure the overseas recipient does not breach the APPs in relation to your personal information.

5.5 Some of AFAC's website and email systems are cloud based services and may be based outside Australia, however AFAC will only transfer personal information outside of Australia in accordance with the APPs including:

- a) with the individual's consent;
- b) where AFAC is satisfied that the recipient of the information will uphold principles for the fair handling of personal information and will not deal with the personal information in a manner inconsistent with the APPs and this Policy; or
- c) an exception applies under the APPs.

6 AFAC AND PURCHASES

6.1 For individuals and agencies who purchase products or services from AFAC, all personal information or credit information gathered from the purchasing of products or services is collected, held and disposed of in accordance with this policy and the Privacy Act.

7 STORAGE AND SECURITY OF PERSONAL INFORMATION

7.1 AFAC will take reasonable steps to ensure the security both in hard copy and electronically of the personal information it collects and holds. This involves protecting the personal information from misuse, loss, unauthorised modification and disclosure.

7.2 When the personal information is no longer required, legally or otherwise, then AFAC will take reasonable steps to destroy or permanently de-identify the personal information.

8 ACCURACY OF AND ACCESS TO PERSONAL INFORMATION

8.1 We will take reasonable steps to ensure the personal information we collect, use or disclose is accurate, complete and up to date.

8.2 You can help us to do this by letting us know if you notice any errors or discrepancies in information, we hold about you and letting us know if your personal details change.

8.3 All individuals are entitled to access a copy of their personal information, or to notify AFAC of corrections or updates to their personal information or its collection, use or disclosure, or if they have any questions about the collection, use or disclosure of their personal information.

9 USE OF COOKIES ON AFAC WEBSITE

- 9.1 AFAC's website allows anonymous browsing and does not require a user to identify themselves unless they wish to register for a service. Any personal information collected will be managed in accordance with this Policy.
- 9.2 The AFAC website and social media use 'cookies'. A 'cookie' is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. AFAC may collect web site usage information such as the IP address an individual is using, the name of their internet service provider, their browser version, the pages of the AFAC website that were requested, the date and time of those requests and the country the individual is in. You are not identifiable from such information.
- 9.3 Except where provided to AFAC on the website AFAC does not collect personal information such as name, mailing address, email address or phone numbers when an individual is browsing the AFAC website.
- 9.4 You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.
- 9.5 If an individual posts information to certain public parts of the AFAC website or to any social media pages operated by AFAC, the individual must acknowledge and accept that the information will be publicly available.

10 DATA BREACH

- 10.1 The Privacy Act requires AFAC to notify individuals and the Commissioner about data breaches that are likely to cause serious harm, ('eligible data breach').
- 10.2 Whether a data breach is likely to result in serious harm requires an objective assessment, determined from the viewpoint of a reasonable person in AFAC's position.
- 10.3 Once we are notified, we will act quickly to remediate a data breach and as a result of this action the data breach may not result in serious harm and notification may not be required.
- 10.4 A data breach includes unauthorised access to or unauthorised disclosure of personal information or loss of personal information.
- 10.5 AFAC will follow the Notifiable Data Breach Scheme and the Privacy Act here.

11 CONTACT

- 11.1 If you have any questions, corrections to personal information, concerns or complaints about this Policy or its application please contact us using the details below:

12 COMPLAINT

- 12.1 AFAC takes all matters regarding privacy seriously and will assess all questions, corrections, concerns or complaints accordingly. AFAC aims to resolve any issues in a timely and efficient manner and will give reasons for its decisions under this Policy.
- 12.2 If your complaint requires a more detailed investigation or consideration, we will acknowledge receipt of your complaint and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will typically gather relevant facts, locate and review relevant documents and speak with individuals involved.
- 12.3 In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.
- 12.4 If you are not satisfied with the outcome of AFAC's assessment or their queries, concern or complaint, a complaint may be made to the Commissioner. The Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website: www.oaic.gov.au.

13 CHANGES TO THIS POLICY

- 13.1 AFAC may amend this Policy from time to time with or without notice to you. We recommend you visit our website regularly to keep up-to-date with any changes.
- 13.2

Definitions:

Commissioner – means the Office of the Australian Information Commissioner.

Member – means an Emergency Service Member or Affiliate Member as specified in the AFAC Constitution and AFAC Policy Member and Customer Categories.

Personal Information – has the same meaning in the *Privacy Act 1988* (Cth).

Secretariat – means the AFAC office and its staff.

Sensitive Information – AFAC does not generally require individuals to disclose any sensitive information such as details of health, race, religious beliefs, etc.

If for any reason AFAC collects sensitive information from an individual (for example, collecting health or dietary information from a delegate to a conference or event) then AFAC will only do so with that individual's consent to the collection, use and disclosure of that sensitive information for the purpose for which it was collected and as permitted by the Privacy Act and other relevant legislation.

Responsibilities: The AFAC CEO is responsible for this Policy and any breaches should they occur.
A Member CEO/Commissioner/Chief Officer is responsible for the conduct of their representatives.

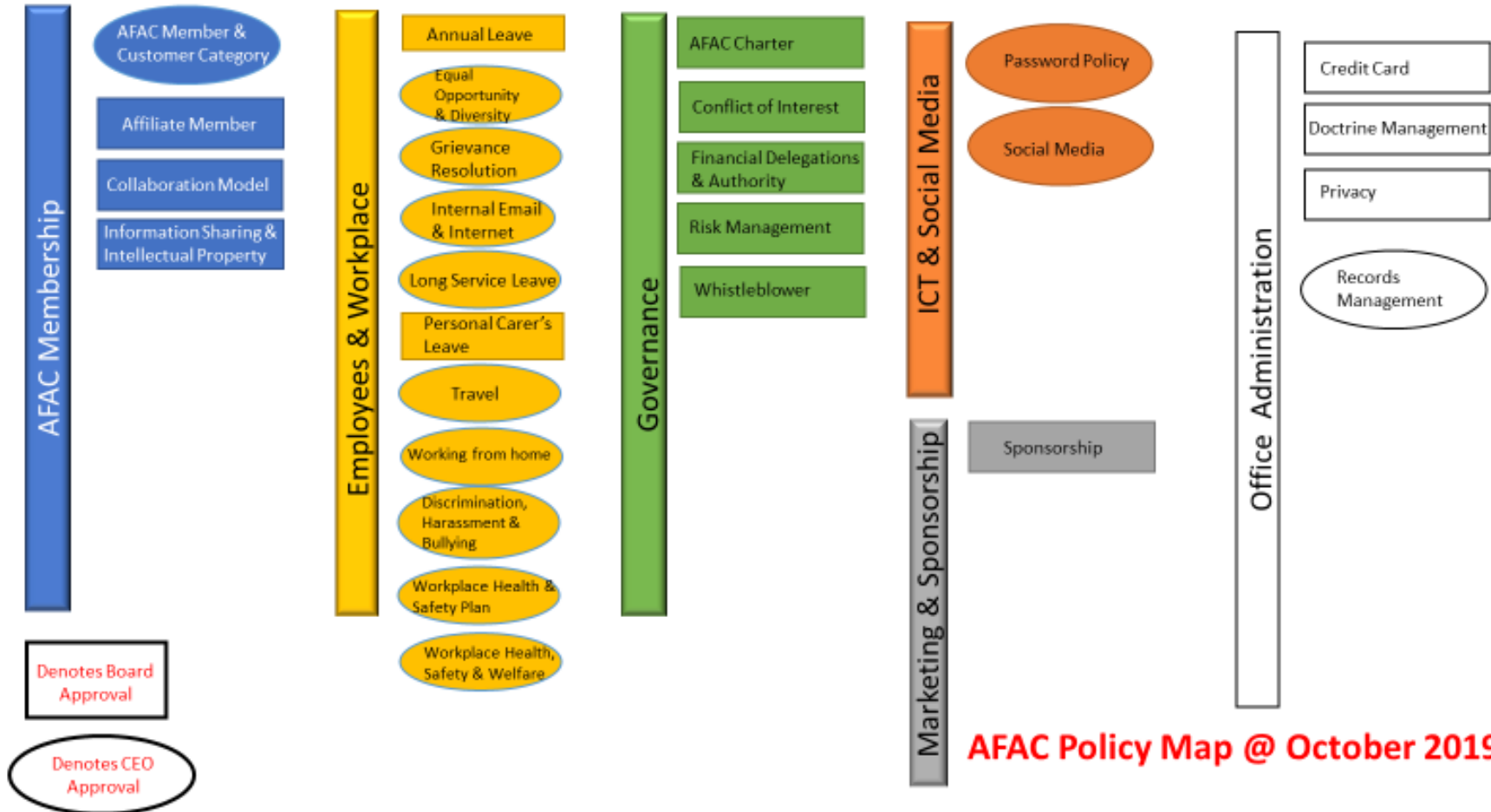
Policy Manager: Director, Business & Finance

Policy Stakeholders: Board Members
AFAC Member Agencies
AFAC CEO and Staff
Contributors of Information to the business of AFAC

Related Documents: Privacy Act 1988 (Cth)
AFAC Information Sharing and IP Policy
AFAC Records Management Policy

Authorised: AFAC Board

Date: 19 September
2019



AFAC Policy Map @ October 2019