

## AICSA Privacy Policy

The Australian Institute of Conveyancers South Australian Division Incorporated (AICSA) is committed to complying with the principles set out in the *Privacy Act 1988 (Cth) (Privacy Act)* and the *Australian Privacy Principles*. This Privacy Policy governs our collection, storage, management, protection, use and disclosure of personal information.

By:

- using the AICSA website;
- accessing, requesting, or enquiring about information relating to AICSA's operations (either online or in person);
- applying for membership of AICSA;
- entering into, or negotiating, a contract or any other form of deed or agreement with AICSA; or
- providing personal information to AICSA, its officers, agents or employees,

after this Privacy Policy has been brought to your attention, you acknowledge and consent to the use, collection, storage or disclosure of your personal information by us in accordance with this Privacy Policy, the *Privacy Act* and the *Australian Privacy Principles*.

If you do not agree to us handling your personal information in the manner set out in this Privacy Policy you should cease your use of this website and not provide us with any of your personal information.

### What is personal information?

We adopt the definition of personal information given in the *Privacy Act*:

*personal information means 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.*

### What kinds of personal information might we collect and hold?

We may collect (and hold) different personal information from you depending upon how you interact with us.

If you access our website, we may collect information about how you have used our website.

If you contact us, we may collect details which include, but are not limited to, your name, address, e-mail address and phone number.

We may also collect information about:

- your demographic (eg. your age, gender, vocation, educational and employment history);
- your attendance at events arranged or sponsored by AICSA, and your participation in AICSA activities or organisations;
- your interests;
- your views on our activities;
- our interactions;
- your location;
- the technology you use to access our services;
- how and when you use our services; and
- government identifiers, such as your driver's licence or conveyancers registration numbers.



Australian Institute  
of Conveyancers  
South Australian Division

Level 3  
255 Pulteney St  
Adelaide SA 5000

**P** 08 8359 2090  
**E** assist@aicsa.com.au  
**W** aicsa.com.au

DX 58223 LTO

## How do we collect your personal information?

We collect personal information about you in a number of ways, including:

- directly from you, for example, when you provide information to us by phone, email, in an application form or through our websites;
- when you post about us on social media;
- when you enter a competition;
- from publicly available sources and databases (where it is unreasonable or impractical for us to collect the personal information directly from you, such as where we have provided you with a reasonable opportunity to provide personal information which we reasonably require for our activities, but you have not provided some or all of it);
- through statutory, regulatory and other governmental processes; and
- from third parties, such as third parties that we have engaged to carry out functions and activities on our behalf (including ticketing agencies).

Where possible, we collect this information from the individual concerned.

If we receive unsolicited personal information, we will assess whether we would have been entitled to collect that personal information and, if not, destroy or de-identify that personal information.

## How do we collect, hold, use and disclose your personal information?

We may use your personal information in order to:

- assess any application you make (eg. for membership), the potential to do business, or engage in an employment relationship, with you;
- manage our relationship with you;
- verify your identity;
- develop a members' register to enable us to maintain contact with our members;
- develop, run, administer and market competitions, programs, activities and other events relating to conveyancing;
- market products, services, merchandise and special offers made available by us or our respective corporate partners, licensees, suppliers and sponsors;
- keep you informed of news and information (such as advance notice of ticket sales) relating to conveyancing, including by distributing newsletters, publications and other communications via various media;
- research and develop new competitions, programs, activities and other events relating to conveyancing;
- research and develop new products, services and merchandise relating to conveyancing;
- administer and manage our respective websites and provide you with access to those websites;
- provide you with information about our activities;
- develop and make proposals to you;
- develop community relationships;
- engage with stakeholders;
- provide you with marketing material;
- contact you in relation to our business activities;
- better understand our stakeholders, clients and customers;
- tailor our marketing, services, promotions and operations;
- perform internal business functions; and
- perform corporate governance, auditing and record keeping functions;
- perform police checks and searches of court or other public records, where reasonably necessary in connection with our business activities.

Our use of personal information may extend beyond these uses, but will be restricted to purposes

that we consider to be related to our functions and activities.

If you do not wish to receive our newsletters, publications and other communications, please contact us (our contact details are set out below).

### **What do we do with your personal information?**

If we collect personal information from you, we may:

- use it for any of the purposes described in this Privacy Policy;
- store it in accordance with this Privacy Policy;
- pass that information to third parties who provide products or services to us (including our accountants, auditors, lawyers, IT contractors, project managers, consultants, insurers and other suppliers and service providers), subject to appropriate confidentiality constraints; or
- provide that information to governmental authorities and other third parties as required by law.

Personal information that we collect directly from you in order to create and maintain our members' database will not be disclosed to third parties, except to:

- companies that we have engaged to carry out functions and activities on our behalf;
- companies that have been engaged by us, to carry out functions and activities on any of our behalf in relation to products, services or activities relating to or in connection with AICSA or conveyancing generally; and
- our professional advisers, including our accountants, auditors and lawyers; our insurers; and others as required or authorised by law.

### **Does AICSA use my information for Direct Marketing?**

We or any marketing agency engaged on our behalf may use your personal information to communicate directly with you to promote a product or service (**Direct Marketing**). We use Direct Marketing to provide you with information about AICSA products, services, events, memberships, activities, competitions, promotions or developments that we believe you may be interested in. If you receive Direct Marketing material from us, and do not wish to continue receiving it, please contact us by any of the methods set out below, asking to be removed from all future Direct Marketing programs. Once we have received your opt-out request, we will remove you from our Direct Marketing programs as soon as reasonably practicable.

### **Health and sensitive information**

In some circumstances we may collect:

- information about your health; or
- other sensitive information about you (for example, information about your racial or ethnic origin).

We may use health information about you to ensure that you have appropriate access and viewing facilities for AICSA events. We will not disclose information about your health to third parties, except as required by law.

In addition, we may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government or a government body or to plan events and

activities. De-identification involves the removal of any information from a record by which you may be identified.

### **Accuracy of your personal information**

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date.

However, we rely on the accuracy of personal information as provided to us both directly and indirectly. If you find that the personal information we hold about you is incorrect, incomplete or out-of-date, please contact us immediately (our contact details are set out below) and we will take reasonable steps to ensure that it is corrected.

### **How do we hold and secure your personal information?**

We take reasonable steps to protect the personal information we collect from misuse, interference, loss, unauthorised access, modification or disclosure and make sure that personal information is stored securely. Those steps include storing paper records in a physically secure place, and using appropriate access controls in relation to our information systems. When personal financial information is sent to us using our website, we use encryption technologies to prevent that information from being read or altered by another person while in transit.

We maintain physical, electronic, and procedural security measures to safeguard personal information including:

- use of appropriate computer system and network security;
- where practicable, contracts with partners with which we exchange information protecting the confidentiality and integrity of personal information;
- contingency plans assessing critical system functions and establishing data backup, disaster recovery and emergency mode operations plans;
- formal, documented policies and procedures for receipt, storage, processing and distribution of information, ensuring its security; and
- documented policies and procedures for the control of the media on which information is stored, including activity tracking and data backup, storage and disposal.

As part of the management of our operations, personal information may be held by SACA in Australia, either at our premises or the premises of TIMG, or with a third party IT services provider.

### **Do we ever send your personal information overseas?**

If you opt into receiving marketing communications, AICSA may, from time to time, utilise marketing and survey services provided by third parties located offshore, such as:

- Google Inc;
- Apple, Inc;
- Twitter, Inc;
- Facebook Inc; and
- Instagram, Inc.

Where this occurs, the disclosure will be for the purpose of marketing AICSA's products, services, events, memberships, activities, competitions, promotions or developments. In that event, you will be provided with a simple means of opting out of AICSA's marketing communications (which means will be drawn to your attention).

### **Your access rights**

We will take reasonable steps to ensure personal information we collect and use is accurate, up-to-date and complete. Subject to some exceptions at law, you are entitled to make a request to access your personal information. We encourage you to update and correct any of your personal

information that we hold.

You may request access to the personal information that we hold about you by contacting us by any of the methods as set out below (an **Access Request**). You should make any Access Request in writing. You will not be charged for lodging such a request. We will provide access by allowing you to inspect personal information, or by giving you a copy of the personal information. If your personal information is not accurate, up-to-date or complete, we will take reasonable steps to ensure that the information is corrected.

Upon receiving an Access Request we may request further details from you to verify your identity. We reserve the right not to provide you with access to personal information if we cannot verify your identity to our reasonable satisfaction.

### **Our website**

In addition to information entered into our website, the site automatically collects two types of information.

First, we may from time to time collect information relating to use of our website, such as which pages are requested and accessed and which browser software is being used. This information enables us to identify the areas of the site which are popular and tailor the site accordingly.

Secondly, we make use of a web browser software feature known as “cookies” which causes the user’s web browser software to store small pieces of textual information on a user’s computer. A cookie helps us to recognise when you re-visit the website, and to optimise your experience. This feature allows us to make our site more useful by appearing to remember information about a user during and between visits. The cookie is stored on your machine, but does not identify you or give us any information about your computer. We do not collect any personal information from you when you use cookies on our website.

### **What happens if you want to deal with us anonymously or using a pseudonym, or if you otherwise provide us with incomplete personal information?**

You can deal with us either anonymously or by using a pseudonym if you choose. If, however, you do so we may not be able to provide you with accurate or useful information, and (in some circumstances) you may not be able to access a full range of our goods and services. For example, we may not be able to process any membership application, provide a definitive response, assess your suitability for a position or your eligibility for certain activities or agreements, or we may need to ask you further questions and require more time to respond.

### **What happens if you have a question or complaint about how we have handled your personal information?**

If you have a question or complaint, you can raise it with us by:

- Emailing: [assist@aicsa.com.au](mailto:assist@aicsa.com.au);
- Calling us on: +618 8359 2090; or
- Sending a letter to: AICSA, L3, 255 Pulteney Street Adelaide SA 5000.

We take all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous or vexatious.

If you aren’t satisfied with the way we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner at <http://oaic.gov.au>.

### **Changes to the Privacy Policy**

From time to time we may need to change this Privacy Policy in line with our business practices.

Changes come into effect from the time when they are brought to your attention, or when you next log onto our website, whichever is earlier. Please make sure you review this Privacy Policy each time you visit our website to keep up to date on any changes.

#### **Further Information**

For further information about AICSA's use of personal information, or to request access to the information we might hold about you, please contact AICSA on (08) 8359 2090; or write to us at AICSA, L3, 255 Pulteney Street Adelaide SA 5000; or email us at [assist@aicsa.com.au](mailto:assist@aicsa.com.au).