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1. Background

The Australian Information Security Association (AISA) is a not-for-profit charity status organisation promoting the field of information security. AISA delivers value to its members and stakeholders through a variety of mechanisms including Branch Meetings, Security Days, newsletters (eDMs), community focused events, discounts to industry events/ training courses and the annual National Conference known externally as Australian Cyber Conference or CyberCon®.

AlSA's core mechanism of providing value to members and associate members (students) is through the *Branches* and their *Branch Meetings and Security Days / One day conferences (e.g., Perth Conference, BrisSec etc)*.

1.1. Purpose

AISA is committed to maintaining the security of the Personal Information ('Personal Information') that you provide to us. When you share your Personal Information with us, we treat it with care.

This Privacy Policy clearly describes our privacy practices and how we collect, hold, use, process, record, store and manage your Personal Information.

We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) the Privacy Amendment (Notifiable Information Breaches) Act 2017 (NDB) (Australia), and to the extent applicable, the EU General Data Protection Regulation (GDPR, Spam Act 2003 (Cth) and the Do Not Call Register Act 2006 (Cth)

By using the AISA website, social media or registering for our events ('Event'), you consent to the collection, processing, and management of Personal Information as set out in this Privacy Policy.

1.2. Intended Readership

The scope of this Policy extends to all Personal Information that we collect, hold, use and disclose in the course of fulfilling AISA's purpose and in complying with law and managing risk.

In fulfilling AISA's purpose our activities include our member relationships, including providing members with information about their Participation, internal operations (management, employees, temporary staff, contractors) and external operations (third parties such as business partners and service providers).

The scope of this Policy extends to our external client-facing activities such as our online presence at www.aisa.org.au and to the Personal Information that is collected through our social media, website and through the use of email for general communications, marketing and member purposes. It also extends to conferences and public events that we arrange and host across Australia.

This policy does not extend to third party websites or to social media accessed via links on our website or email communications. Use of third-party links and social media will be governed by the privacy policies and terms of use of the relevant service providers.

2. Services

AISA operates www.aisa.org.au, www.aisa.org.au, www.cyberconference.com.au (the 'Site/s'). The Site/s are owned and operated by Australian Information Security Association (AISA) Limited (ABN 18 171 935 959) ('AISA').

You can register for an account ('Account') through the Site/s to register for an Event ('Registrant') and or AISA Membership.

By registering for an Account through the Site/s, you will be required to accept our Terms and **Privacy Policy** by clicking "register" in the Registrant interface or Join Now in the Membership Join process. By clicking "register" you agree to all the terms and conditions of our Terms and **Privacy Policy** listed on the Site which gives notice to you through our Registrant interface as follows:

By **Registering**, you agree that you've read and accepted our Terms and Conditions and you consent to our Privacy Policy.

3. What Personal Information is collected

- **3.1.** "Personal Information" is information or an opinion that can reasonably identify an individual (s 6(1) of the Privacy Act). This means any information about an identified or identifiable person.
- **3.2.** We receive and store Personal Information you provide to us through your use of our Site/s or when you register to attend an Event.
- **3.3.** We may ask you to provide Personal Information such as your name, organization, job title, address, email address, mailing address, telephone number, and payment details.
- **3.4.** We may collect additional data from you at other times, including but not limited to, when you provide feedback, when you provide content and data, change your content or email preference, respond to surveys and promotions, or communicate with our customer support through electronic media including by the Internet, phone, text messages, emails, and newsletters.

4. How we collect that information

- **4.1.** AISA collects Personal Information from you in a variety of ways, including when you interact with us electronically or in person, when you register to attend our Events and when we provide you with access to products and services.
- **4.2.** We may also receive Personal Information from third parties in connection with the supply of our Services. If we do, we will protect your Personal Information in accordance with this Privacy Policy.

5. How we use your Personal Information

AISA uses your Personal Information, and you consent to us using your Personal Information to:

- supply you with access to our Events or products and services in accordance with our Terms:
- provide you with information and updates about our Events;
- manage your relationship with AISA, and deal with your requests, complaints, and enquiries;
- communicate with you by a variety of measures including, but not limited to, by

- telephone, email, SMS, newsletters, or mail;
- sending you service messages about your Event registration, subscription or account sign up;
- for marketing and advertising;
- manage, research, and develop our Events including through data analytics and research and development;
- · administer our business activities; and
- to meet legal, regulatory and compliance obligations.
- **5.1** If you choose to withhold your Personal Information, it may not be possible for us to provide you with access to Events or products and services or for you to access certain parts of our products and services and for us to respond to your queries.
- 5.2 You may share your Personal Information with others when you authorise and make something public including on our Site which the public can access or see, for example, when you purchase a listing on our Site (if this option is made available to you) where various types of information about you and your business will be publicly displayed on our Site listings.

6. Images, photography and videography/filming

- **6.1.** In these Terms, **'Media'** means all photographs, film, audio, or other recording including all negatives, transparencies, prints or digital information pertaining to them, still or moving, taken of me and includes all digital, electronic, print, television, film, radio, audio, audio-visual works and other media now known or to be invented.
- **6.2.** You irrevocably consent to being filmed or photographed by AISA (or its representatives) and to AISA using your name, likeness, image or voice through Media for the purpose of promoting our Events, or other products and services. No remuneration is payable for such use.
- **6.3.** You agree to give AISA and their agents and assigns, all right, title and interest to use or alter the Media for any lawful purpose which may include but not be limited to, advertising, promotion, marketing, social media, trade and packaging for any product or service, whether used in conjunction with my name or any other name. AISA's rights in relation to the Media include the following:
 - 6.3.1. using, reproducing, adapting, or exploiting all or any part of the Media;
 - 6.3.2. the use of Media for advertising, merchandising or promotional purposes of any kind;
 - 6.3.3. attributing authorship of the Media to AISA;
 - 6.3.4. not attributing authorship of the author when communicating, exhibiting, or performing the Media to the public or in public, and when reproducing, copying, publishing, and adapting the Media;
 - 6.3.5. materially altering the Media in any way, or making any modification, variation, or amendment of any nature whatsoever to the Media; and
 - 6.3.6. using the Media for research, analytics, and marketing purposes.
- **6.4.** You agree that the Media may be combined with other material and may be cropped, altered, or modified.
- **6.5.** You release AISA, its affiliates, officers, agents, and employees from any claims for remuneration or any form of damage whether foreseen or unforeseen associated with the proper artistic or commercial use of the Media. You agree that this release is irrevocable and applies in all States and Territories of Australia and worldwide.

6.6. You agree that you must not take photographs, make film, audio, or other recording at the Event for commercial purposes without our written permission. We reserve the right to require that cameras, audio and video recorders or other equipment may not be used at certain Events.

7. Legal basis in the European Union (EU) for the collection and processing of your Personal Information

- **7.1.** "Personal Information" refers to any information relating to an identifiable natural person who can be identified directly or indirectly ('Information Subject') (Article 4).
- **7.2.** We adhere to the GDPR's data protection and accountability principles:
 - data processing must be fair to the data subject
 - data must only be processed for specific and legitimate purposes
 - don't collect more data than you need
 - ensure the data you collect is accurate
 - don't store personal data longer than needed for the specified purpose
 - process data in a way that ensures security, integrity, and confidentiality
 - be able to demonstrate compliance with these principles.
- 7.3. If you are an individual residing in the EU, we may collect and process Personal Information about you in accordance with the GDPR. A "Controller" says how and why Personal Information is processed and a "Processor" acts on behalf of the Controller by processing the data.
- **7.4.** The GDPR applies to the data collection and processing activities of businesses with an establishment in the EU or where the processing activities relate to offering goods or services to individuals in the EU or monitor the behaviour of individuals in the EU.
- 7.5. When you register for our Events or access products and services, we process Personal Information on your behalf as a Processor where you are the Controller and otherwise to the extent that we are a Controller as defined in the GDPR.
- **7.6.** The legal basis that we collect and process your Personal Information is based on the following:
 - Contractual basis. This legal basis applies to the collection or processing of Personal Information in order to fulfil or perform a contract with you, or to which you are a party.
 - Consensual basis. This applies where you have provided your consent to the
 collection or processing of Personal Information for a specific purpose (for
 example, to provide you with marketing updates). You can withdraw your
 consent at any time by updating your email preferences, opting out, or by
 contacting us directly.
 - Legitimate interests. This applies where we have a legitimate interest to collect or process your Personal Information. For example, it may be to respond to an enquiry about our Services, or to improve our Services.
 - Legal obligations. This applies where it is necessary to disclose your Personal Information to comply with a legal obligation.

- 1.7. "Processing" means any operation or set of operations that is performed upon Personal Information or sets of Personal Information whether automated or not including for collection, recording, organization, structuring, storage, adaption, or alteration, retrieval, consultation, use, disclosure by transmission or for dissemination. We only employ third-party data processors that are compliant with the GDPR requirements and that have sufficient security measures in place to protect and safeguard your data.
- **7.8.** We will only otherwise collect your Personal Information with your express consent for a specific purpose and any Personal Information collected will be to the extent necessary and not excessive for its purpose. We will keep your data safe and secure.
- 7.9. We process Personal Information in accordance with your documented instructions and we will not engage another processor without your prior specific and written consent. We will make available to you all information necessary to show our compliance with the GDPR including that we have taken appropriate security measures to protect the Personal Information in accordance with the GDPR. We will delete or return the Personal Information to you at the end of our interaction with you in accordance with your explicit instructions.
- **7.10.** In the event of a Personal Information breach including any breach of security that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Information transmitted, stored or process, we will report the breach to you without undue delay after becoming aware of the breach, and not later than 72 hours after the breach giving you a description of the nature of the breach.
- **7.11.** Unless otherwise required by contractual obligation or any other legal basis, we only store your Personal Information while it remains necessary, or if the purpose of the processing could not reasonably be fulfilled by other means.

8. The Personal Information rights of individuals under the GDPR

- **8.1.** If you are an individual residing in the EU, you have certain rights as to how your Personal Information is being controlled and used.
- **8.2.** We comply with your rights under the GDPR (subject to the grounds set out in the GDPR) that permit you:
 - 8.2.1. to be informed as to how your Personal Information is being used;
 - 8.2.2. to access your Personal Information and to know specifically what information is held about you and how it is processed, where and for what purpose (we will provide you a copy of your Personal Information in electronic format free of charge if requested);
 - 8.2.3. to rectify your Personal Information if it is inaccurate or incomplete;
 - 8.2.4. to erase your Personal Information (also known as 'the right to be forgotten') if you wish to delete or remove your Personal Information;
 - 8.2.5. to restrict processing of your Personal Information;
 - 8.2.6. to retain and reuse your Personal Information for your own purposes (Personal Information portability);
 - 8.2.7. to object to your Personal Information being used; and
 - 8.2.8. to object against automated decision making and profiling.

- **8.3.** You can contact us any time to exercise your rights under the GDPR including as to:
 - 8.3.1. request access to Personal Information that we hold about you;
 - 8.3.2. to correct any Personal Information that we hold about you;
 - 8.3.3. delete Personal Information that we hold about you; or
 - 8.3.4. opt out of emails, marketing, and any other push notifications that you receive from us.

We may ask you to verify your identity before acting on any of your requests.

If you have any questions about AISA's collection and storage of data, please contact us at privacy@aisa.org.au

9. International data transfers

- **9.1.** We may store, process, and transfer your data, including your Personal Information in Australia and also in countries other than the country you live in. Information transfer may occur in and between countries outside of Australia including to countries that may not have data privacy legislation that is equivalent to that in the country where you reside or where such Personal Information may be accessible by government agencies.
- **9.2.** You may not have the same rights to protect your data in these countries as you do in Australia. Where your data has been transferred to a country abroad, it will be treated in accordance with the purposes described in this Privacy Policy.
- **9.3.** Where the GDPR applies, we only employ third-party data processors that are compliant with the GDPR requirements and that have sufficient security measures in place to protect and safeguard your data.
- **9.4.** To protect data transfers across national borders (or out of the European Economic Area), AISA will protect the transfer of Personal Information as required by law including implementing standard contractual clauses where recognised by law, under the Privacy Shield Principles and the Trans-Atlantic Data Privacy Framework if this applies, or other lawful means of transferring Personal Information.

10. Disclosure of your Personal Information to other registrants and third parties with access to it

- **10.1.** We will only share your Personal Information where you have given us your consent, and only for the purposes described in this Privacy Policy.
- 10.2. We may disclose your Personal Information to any of our employees, officers, insurers, professional advisers, agents, suppliers, or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy. Personal Information is only supplied to a third party when it is required for the delivery of our Services.
- 10.3. We may also share your Personal Information with other Registrants on the Site or our sponsors where you have authorised us to do so to interact with others on your behalf and for a Registrant to connect with another Registrant through the Site in accordance with the Terms. You authorise us to provide your Personal Information to another Registrant on the Site or our sponsors only for the primary purpose that we collected it, and where you have provided us with your consent.

- 10.4. You are solely responsible for your use of the Personal Information of others, and you undertake that you will only use and deal with Personal Information in accordance with the Privacy Act and the GDPR and all other applicable laws and regulations in the applicable jurisdictions.
- **10.5.** We may share your Personal Information with third-party service providers to help us provide our Services, and to provide you with a payment platform.
- 10.6. When we disclose your Personal Information to third-party service providers, we do so on the basis that your Personal Information is treated with confidence, and only used for the limited purpose of providing support for registration to our Events or access to products and services, and in a manner consistent with this Privacy Policy.
- 10.7. If we need to disclose Personal Information to third parties in a different country to where the information was collected, we will take steps to ensure that there is a lawful basis for the disclosure and that the disclosure complies with all applicable laws.
- 10.8. We may from time to time need to disclose Personal Information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
- **10.9.** If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer Personal Information to the extent permissible at law.

11. Data retention

The length for which AISA retains user data may further be determined by legal and regulatory requirements.

The main systems that store AISA data are:

- IMIS
- Campaign Monitor
- Events Air

The following sub-sections provide guidance around data handling within these systems:

11.1 IMIS

Data stored in IMIS includes, but is not limited to: Member data: this can include name, address, email address, mobile phone number, employment organisation details (optional), gender (optional), historical record of event attendance and CPE diary, any communications or EDMs that have been sent from IMIS, member ID.

It is an auditing requirement that on June 30th every year AISA must compile a complete list of all active members for that year with identifiable data. This information must be retained for seven (7)) years.

11.2 Campaign monitor

Data stored in Campaign Monitor includes, but is not limited to:

- Active member details (first name, email address, branch)
- Previous year Cyber Conference delegates.

Any data can be exported from IMIS and imported into Campaign Monitor. The General Manager periodically exports the active member list from IMIS into Campaign Monitor.

- Cyber Conference data should be retained for a minimum of twelve (12) months.
- All old lists should be removed as they are replaced by a new, more current list.

11.3 Events Air

Data stored in Events Air includes, but is not limited to:

- Registrations for Australian Cyber Conference Canberra and Melbourne
- Contracts with 3rd party suppliers.

12. Security of information

- **12.1.** We are committed to taking reasonable steps so that the Personal Information you provide to us is secure.
- 12.2. To prevent unauthorised access or disclosure, we have put in place physical, electronic, and managerial procedures, to safeguard and secure Personal Information and protect it from misuse, interference, loss and unauthorized access, modification, and disclosure. These measures include the use of software and other electronic measures such as firewall, logs, and email notifications.

12.3. Microsoft 365

We use Microsoft 365 to conduct our work, which includes handling documents and correspondence that contain Personal Information. We only use the following products and services: Exchange, OneDrive, SharePoint, Teams, Planner, and Office.

We have set up reasonable security safeguards including multi-factor authentication (MFA), role-based access controls, and promptly applying patches to applications and devices.

Our Microsoft 365 data is stored in Australia.

Microsoft's Trust Center is located <u>here.</u>

13. Notifiable data breach ('NDB')

- 13.1. The security of your data is important to us but no method of transmission over the Internet 100% private and secure. We do not guarantee or warrant the absolute privacy or security of any data we collect from or about you.
- 13.2. The Internet is an insecure medium and users should be aware that there are inherent risks transmitting information across the Internet. Information submitted unencrypted via electronic mail or web forms may be at risk of being intercepted, read or modified.
- 13.3. A reportable "Data Breach" is a security incident where the integrity of Personal Information is compromised through being destroyed, lost, altered, corrupted, disclosed or accessed by an unauthorised person where it is likely to result in serious harm to any individual affected.
- 13.4. We have procedures and systems in place including a data breach incident response plan, specific data breach policies and procedures and personnel to deal with an actual or suspected "Data Breach" and will notify you and the applicable regulator in

accordance with our obligations under the Privacy Laws and the NDB.

13.5. Please report to AISA any actual or suspected data breaches for investigation by using the contact details provided below.

14. Access to your Personal Information

- 14.1. You may request details of Personal Information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth), and to the extent applicable the EU GDPR. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us privacy@aisa.org.au.
- **14.2.** We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act or any other applicable law.

15. Third-party tools

- **15.1.** We may use technologies and third-party subscription services that use Google Analytics, pixels, tags and web beacons (code snippets) to improve the user experience of our Site and to analyse how people access our Site to register for Events.
- The other information we collect is mostly anonymous traffic data aside from the approximate location (IP address) and may include browser type, device information, and language. The information collection is in aggregate form so that it cannot identify any individual Registrant and provides an overview of how people use our Site.

16. Cookies and social media features

- 16.1. Cookies are small text files that can be stored on your computer, tablet, or mobile device when you visit our Site. These small files contain information about browsing activity. Cookies are used to identify you when you come back to a website and store details about your use of the website. In addition, cookies can be used to analyse traffic and may be used to serve relevant ads to Site visitors through third party services such as Google AdWords.
- 16.2. We may use persistent and session cookies to track your use of our Site. Persistent cookies are stored as a file on your computer and remain there when you close your web browser. Session cookies are only stored on your computer during your web session and are automatically deleted when you close your browser.
- 16.3. We use cookies to improve user experience. This enables us to understand how you use the Site and track any patterns with regards how you are using our Site. Cookies allow us to distinguish you from other users, so that we can recognise you each time you visit. Cookies also allow us to store Registrant preferences and provide you with a positive experience when you browse this Site, including enabling you to personalise Site settings.
- You may opt-out from the collection of cookies by editing your browser options, but certain features of our Services will not function if you disable cookies. To find out how to manage cookies on browsers, visit the specific browser developer's website. To opt out of being tracked by Google Analytics, visit https://tools.google.com/dlpage/gaoptout
- **16.5.** We may include social media features such as the Facebook Like button, and widgets, such as the Share This button or other interactive mini programs that run on our Site. Social media features and widgets are either hosted by a third party or hosted directly

on our Site. Your interactions with these features are governed by the privacy policy of the platform providing it.

17. Links

- 17.1. Our Services may from time to time have links to other sites not owned or controlled by us. Links to third party sites do not constitute sponsorship or endorsement or approval of these sites.
- **17.2.** AISA is not responsible for the privacy practices of other such websites.

18. Complaints about privacy

18.1. If you have any complaints about our privacy practices, please contact us. We will respond promptly to your communications.

19. Changes to this privacy policy

19.1. We may modify this Privacy Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting on our Site.

20. How to contact us

- **20.1.** This Site is operated Australian Information Security Association (ABN 18 171 935 959)
- **20.2.** Our principal place of business is at

Level 8, 65 York Street, SYDNEY NSW 2000, Australia.

- **20.3.** You can contact us:
 - by post, using the mailing address given above;
 - using our contact form on the Site, should one be made available to you;
 - by calling us at (02) 8076 6012; or
 - by email at info@aisa.org.au

21. Relationship to other AISA documents

This document is part of a broader suite of AISA policies, procedures and guidelines.

Specifically, the Privacy Policy should be read in conjunction with:

- AISA Constitution and Code of Ethics
- Terms & Conditions for the Events
- Privacy Policy Website Statement