

Privacy Policy - AACCP

Last updated: November 2018

1. We respect your privacy

Australian Association of Collaborative Professionals Limited (ABN 34 617 891 004) and its Related Bodies Corporate (as defined by the provisions of the *Corporations Act 2001* (Cth)) (**AACP, we, us and our**) respects your privacy and is committed to protecting it.

We comply with the Australian Privacy Principles and the *Privacy Act 1988* (Cth) (**Privacy Act**), which govern the way private sector organisations collect, use, keep secure and disclose Personal Information.

The Privacy Act defines “**Personal Information**” to mean any information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true; and whether the information or opinion is recorded in a material form.

This Privacy Policy sets out how we handle your Personal Information. If you have any concerns or questions, please contact us the address set out in **Section 11** and our privacy officer will resolve your concern or answer your question.

We recommend that you keep this information for future reference.

2. Kinds of Personal Information

We will only use or disclose your Personal Information for the primary purposes for which it was collected, or as consented to by you.

At or around the time we collect Personal Information from you, we will endeavour to provide you with a notice which details how we will use and disclose that specific information.

We set out some common collection, use and disclosure instances in the table below.

Purpose	Type of Information	Uses	Disclosures
General enquiries (via website or email)	<ul style="list-style-type: none"> • Contact information: Such as your name phone number and email address. • Other personal information volunteered by you in the content of your enquiry • Customer Service: Any personal information collected in connection by our customer services department in processing and addressing your enquiry. 	<p>The uses we will make of Personal Information collected for this purpose include:</p> <ul style="list-style-type: none"> • Services: the provision of our services to you including: <ul style="list-style-type: none"> - Using your Personal Information in order for you to use the products and services offered. - To provide customer service functions, including handling customer enquiries and complaints. • Marketing: using your Personal Information for the purposes set out in “<i>Marketing Services</i>” section below. • General administrative and security use: <ul style="list-style-type: none"> - To protect AACP’s websites from security threats, fraud or other criminal activities. - For the administration and management of AACP. - For AACP’s marketing and customer base analytics, including asking about collaborative practice. - The maintenance and development of our products and services, business systems and infrastructure. - In connection with the sale of any part of AACP’s business or a company owned by an AACP entity. - To provide customer services to clients and for quality assurance purposes. 	<p>The types of disclosures we will make of Personal Information collected for the type of purposes listed include, without limitation, to:</p> <ul style="list-style-type: none"> • Service providers (including IT service providers and consultants) who assist AACP in providing our products and services. • Related Bodies Corporate of AACP (including related entities) - such as Collaborative Professionals NSW or Queensland Association of Collaborative Professionals. • Third parties in connection with the sale of a part of AACP’s business or a company owned by an AACP entity. • As required or authorised by law.

Purpose	Type of Information	Uses	Disclosures
Membership	<ul style="list-style-type: none"> • Contact and identifying information: Such as your name, company name, email address, phone numbers and photo. • Other personal information volunteered by you during the membership transaction process • Membership sales or renewal transactions: To the extent relevant to your transaction, we will collect: <ul style="list-style-type: none"> - Delivery information. - Billing and account details. • Customer Service: Any personal information collected in connection by our customer services department in processing and addressing your application. 	<p>For full details relating to uses of Personal Information in relation to the use of credit information, please refer to our Credit Reporting Policy.</p> <ul style="list-style-type: none"> • [Membership Payments: The processing of any payments and refunds (if applicable), credit card authorisation, verification and debt collection.] • Online accounts: If you create an account with AACCP and you provide us your Personal Information for this collection purpose, we will use it for: <ul style="list-style-type: none"> - Processing of account transactions. - Customer service related contact. - The uses listed under “<i>Marketing Services</i>”. • General administrative and security use as detailed in the Uses column for “<i>General enquiries</i>”. 	<p>For full details relating to disclosures of Personal Information in relation to any credit information, please refer to our Credit Reporting Policy.</p> <p>In summary, we may disclose this type of Personal Information to:</p> <ul style="list-style-type: none"> • Our contractors, agents and third party providers who undertake billing and credit services on our behalf. • Third party providers who assist us in providing our products and services to you. • Third parties, such as external debt recovery agents, court or other entities to which we are required by law to disclose Personal Information. • Third parties connected with the payment process including ecommerce, payment gateway providers and financial institutions • The parties listed in the Disclosure column for “<i>General enquiries</i>”.
Marketing Services	<ul style="list-style-type: none"> • Contact information: Such as your name, email address and company name. • Mailing list: Personal Information collected upon registration for a mailing list. • Social media activity: Personal Information collected as a result of your interactions with, or posts about, us on social media, including “likes”, comments posted, any of your oppositions or feedback, photos posted or uploaded, and other information pertaining to your social media activities which concern, or relate, to AACCP. • Feedback and surveys: Any contact and identifying information provided to us as part of submitting any feedback or completing surveys for us, as well as any other Personal Information you volunteer as part of your feedback or survey answers. 	<ul style="list-style-type: none"> • General marketing and consumer analytics: using your Personal Information: <ul style="list-style-type: none"> - To aggregate with other information and to then use it for marketing and consumer analytics. - To offer you updates on events, training or information that may be of interest to you. - For marketing and promotional activities by us (including by direct mail, telemarketing and email) such as our email alerts and newsletters. - For the Uses detailed above in “<i>General enquiries</i>”. • Online accounts or social media: If you create an account with AACCP or participate in our social media platforms (such as Facebook, Twitter and Instagram) and you provide us your Personal Information, we will use it for: <ul style="list-style-type: none"> - Adding account holders to the marketing database. - Customer service related contact. - Responding to social media messages. 	<p>We may disclose your Personal Information to:</p> <ul style="list-style-type: none"> • Third parties connected with the marketing process who assist us in providing our products and services to you. • The parties listed in the Disclosure column for “<i>General enquiries</i>”.

Purpose	Type of Information	Uses	Disclosures
		- Fulfilling social media platform rules.	
Events and training	<ul style="list-style-type: none"> • Attendees at conferences, events or training: Personal information including: <ul style="list-style-type: none"> ▪ Contact information: Such as name, company name (if applicable), e-mail address, phone numbers. • Speakers at conferences, events or training: Personal information including: <ul style="list-style-type: none"> ▪ Contact information: Such as name, company name (if applicable), e-mail address, phone numbers, ▪ Identifying information: Such as photo, short bio about career highlights, professional qualifications or other information offered. • Transaction Information: Such as: <ul style="list-style-type: none"> - Information specified in “contact information for student applications and online accounts” - Billing and account details. - Payment card details. - Details of required primary identification. 	<ul style="list-style-type: none"> • Conference, training and event attendee information: Utilising the information collected in connection with event ticketing and payment. • Processing payment for attendance at events, conferences or training: The processing of any payments, and refunds, if applicable. • Speakers: Utilising the information collected in connection with the provision of events, conferences and training and if required, the verification of identity and qualifications obtained, to confirm eligibility to deliver relevant presentation. • Marketing: using your personal information for the purposes set out in “Marketing Services” section below. 	<p>The types of disclosures we will make of person information collected for the type of purposes listed include, without limitation, to:</p> <ul style="list-style-type: none"> • Third parties, such as external debt recovery agents, court or other entities to which we are required by law to disclose personal information. • Third parties connected with the payment process including ecommerce, payment gateway providers and financial institutions • Service providers (including IT service providers and consultants) who assist us in providing and maintaining our services. • Third parties connected with the marketing process who assist us in providing newsletters and events to you. • Related Bodies Corporate of AACCP (including related entities) - such as Collaborative Professionals NSW or Queensland Association of Collaborative Professionals.
Human resources	<ul style="list-style-type: none"> • Contact information: Such as your name, e-mail address, current postal and residential address, phone numbers, country of residence, next of kin contact details. • Employee record information • Identifying information: Such as your photo, passport and residency details, date of birth. • CV, resume or application related information: Such as the details provided in your resume or CV, your eligibility to work in Australia, visa details, your education, previous employment details, professional memberships or qualifications. • Tax, superannuation and payroll information: Such as your Tax File Number and ATO Declaration, Superannuation details and financial institution details. 	<ul style="list-style-type: none"> • Pre-employment screening: Utilising the information collected for the purpose of assessing candidate suitability for role, including by obtaining: <ul style="list-style-type: none"> - Verification of your identity - Background checks - Confirmation of eligibility to work in Australia. - Confirmation of education and qualifications. - Confirmation of previous employment. • Administration and performance monitoring use: Utilising the information collected for the purpose of: <ul style="list-style-type: none"> - Dealings related to the employer/employee relationship or the contractor/principal relationship (as the case may be). 	<p>We may disclose your Personal Information to:</p> <ul style="list-style-type: none"> • Government agencies, including but not limited to The Australian Taxation Office, Centrelink and Department of Human Services. • Relevant Worker’s Compensation organisation (e.g. WorkCover, etc). • Third party referees provided by you in connection with an application made to AACCP • Service providers engaged to assist AACCP in the administration of its business (including IT service providers, HR software provider and payroll providers), if any. • Recruitment agents used in connection with your application with us.

Purpose	Type of Information	Uses	Disclosures
	<ul style="list-style-type: none"> • Background check information: Information obtained from you or third parties to perform background checks. • Performance related information: Pre-employment testing and other information collected by AACCP's systems in the course of the employee or contractor's engagement with AACCP. • Information collected from referees 	<ul style="list-style-type: none"> - Use of such information whether or not the employment or contractor relationship is prospective, current or past. - Use of such information to monitor systems, performance and time usage and internet usage. - The use of your Personal Information collected in the administration and management of AACCP. - In connection with the sale of any part of AACCP's business or a company owned by an AACCP entity. 	<ul style="list-style-type: none"> • Third parties in connection with the sale of a part of AACCP's business or a company owned by an AACCP entity. • Third party parties in connection with obtaining any background checks, pre-employment screening. • Financial institutions for payroll purposes. • As required or authorised by law.

3. Collecting & holding Personal Information

3.1 Collection generally

As much as possible or unless provided otherwise in this Privacy Policy or a notification, we will collect your Personal Information directly from you.

We may collect your Personal Information from you in a variety of ways, including: by email, website and forms. When you engage in certain activities, such as filling out a survey or sending us feedback, we may ask you to provide certain information. It is completely optional for you to engage in these activities.

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information or any other information we require in order for us to provide our products or services to you, we may be unable to provide our products or services to you in an effective manner, or at all.

3.2 Other collection types

We may also collect Personal Information about you from other sources, such as:

- (a) when we collect Personal Information about you from third parties; or
- (b) when we collect Personal Information about you from publically available sources including but not limited to, court judgments, directorship and bankruptcy searches, Australia Post, White Pages directory, and social media platforms (such as Facebook, Twitter, Google, Instagram etc.).

3.3 Notification of collection

If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why, unless special circumstances apply, including the following circumstances:

- (a) where information is collected from any personal referee you have listed on any application form (including any employment application) with AACCP;
- (b) where information is collected from publically available sources including but not limited to court judgments, directorship and bankruptcy searches, social media platforms (such as Facebook, Twitter, Google, Instagram etc.); or
- (c) as otherwise required or authorised by law.

3.4 Unsolicited Personal Information

In the event we collect Personal Information from you, or a third party, in circumstances where we have not requested or solicited that information (known as unsolicited information), and it is determined by AACCP (in its absolute discretion) that the Personal Information is not required, we will destroy the information or ensure that the information is de-identified. However, where unsolicited Personal Information is collected in relation to your future potential employment with AACCP, we may keep this Personal Information.

3.5 How we hold your Personal Information

Once we collect your Personal Information, we will hold it securely and store it on either, infrastructure owned or controlled by us, or with a third party service provider who have taken reasonable steps to ensure they comply with the *Privacy Act*. Refer to **Section 9 (Data security and quality)** for more information.

3.6 Cookies and IP addresses

If you use our website, we may utilise "cookies" which enable us to monitor traffic patterns, trends and to serve you more efficiently if you revisit our website. In most cases, a cookie does not identify you personally but may identify your internet service provider or computer.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

However, in some cases, cookies may enable us to aggregate certain information with other Personal Information we collect and hold about you. We extend the same privacy protection to your Personal Information, whether gathered via cookies or from other sources, as detailed in this Privacy Policy.

You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. However, if you disable cookies, you may not be able to access certain areas of our websites or take advantage of the improved web site experience that cookies offer.

4. Using & disclosing Personal Information

4.1 Use and disclosure details

We provide a detailed list at **Section 2** of some common uses and disclosures we make regarding the Personal Information we collect. We may also use or disclose your Personal Information and in doing so we are not required to seek your additional consent:

- (a) when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your Personal Information to be used or disclosed for such a purpose;
- (b) if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- (c) if we have reason to suspect that unlawful activity has been, or is being, engaged in; or
- (d) if it is required or authorised by law.

4.2 Use and disclosure procedures

In the event we propose to use or disclose such Personal Information other than for reasons set out in the above table at **Section 2** or as otherwise outlined in this Privacy Policy, we will first notify you or seek your consent prior to such disclosure or use.

Your Personal Information is disclosed to these organisations or parties only in relation to the products or services we provide to you or for a purpose permitted by this Privacy Policy.

We take such steps as are reasonable to ensure that these organisations or parties are aware of the provisions of this Privacy Policy in relation to your Personal Information.

4.3 Communications opt-out

If you have received communications from us and you no longer wish to receive those sorts of communications, you should use the Unsubscribe link in all of our email communications, or contact us via the details in **Section 11.2** and we will ensure the relevant communication ceases.

Any other use or disclosure we make of your Personal Information will only be as required or authorised by law or as permitted by this Privacy Policy or otherwise with your consent.

5. Sensitive information

5.1 Sensitive information generally

Sensitive information is a subset of Personal Information. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual

orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

5.2 Collection and use of sensitive information

In general, we do not collect sensitive information from you, but depending on the uses you make of our products and services this may not always be possible and we may collect sensitive information from you in order to provide services provided to you. However, we do not collect sensitive information from you without your consent.

We do not use sensitive information to send you Direct Marketing Communications (as set out in **Section 6** below) without your express consent.

5.3 Consent

We may collect other types of sensitive information where you have consented and agree to the collection of such information. Generally speaking, we will obtain this type of consent from you at (or around) the point in time in which we collect the information.

6. Direct Marketing

6.1 Express informed consent

You give your express and informed consent to us using your Personal Information set out in:

- (a) the “*General Enquiries*” section of the table at **Section 2** of this document above; and
- (b) the “*Marketing Services*” section of the table at **Section 2** of this document above;

to provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you, whether by post, email, SMS, messaging applications and telephone (**Direct Marketing Communications**).

6.2 Inferred consent and reasonable expectations of direct marketing

Without limitation to paragraph 6.1, if you have provided inferred or implied consent (e.g. not opting out where an opt-out opportunity has been provided to you) or if it is within your reasonable expectation that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your Personal Information for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.

6.3 Opt-out

If at any time you do not wish to receive any further Direct Marketing Communications from us or others under this **Section 6**, you may ask us not to send you any further information about products and services and not to disclose your information to other organisations for that purpose. You may do this at any time by using the “unsubscribe” facility included in the Direct Marketing Communication or by contacting us via the details set out in **Section 11**.

7. Anonymity and pseudo-anonymity

To the extent practicable and reasonable, we will endeavour to provide you with the option of dealing with AACCP on an anonymous basis or through the use of a pseudonym. However, there may be circumstances in which it is no longer practicable for us to correspond with you in this manner and your Personal Information may be required in order to provide you with our products and services, or to resolve any issue you may have. This includes but is not limited to your (and your organisation’s) membership in AACCP.

8. Cross Border Disclosure

8.1 Cross border disclosures

AACP does not store, or transfer your Personal Information to a destination outside of Australia.

However, we utilise third party services providers and overseas contractors to assist us with providing our goods and services to you, who disclose Personal Information overseas. These third party service providers disclose your information to the places detailed below in our Cross Border Disclosures Table.

Services providers and related functions	Countries
IT service providers for administrative applications and website functions	
IT service providers for sales and after sales processes (including payment processing)	
IT service providers relating to direct marketing applications and functions	United States
Service providers for other marketing functions and promotions	
Service providers for recruitment services, and workforce management	

As we use service providers and platforms which can be accessed from various countries via an Internet connection, it is not always practicable to know where your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed above.

8.2 Provision of informed consent

By submitting your Personal Information to AACCP, you expressly agree and consent to the disclosure, transfer, storing or processing of your Personal Information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to Personal Information. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

The *Privacy Act* requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your Personal Information outside of Australia do not breach the privacy principles contained within the *Privacy Act*. By providing your consent, under the *Privacy Act*, we are not required to take such steps as may be reasonable in the circumstances. However, despite this, we acknowledge the importance of protecting Personal Information and have taken reasonable steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

8.3 If you do not consent

If you do not agree to the disclosure of your Personal Information outside Australia by AACCP, you should (after being informed of the cross border disclosure) tell AACCP that you do not consent. To do this, either elect not to submit the Personal Information to AACCP after being reasonably informed in a collection notification or please contact us via the details set out in **Section 11**.

9. Data security & quality

9.1 AACCP's security generally

We have taken steps to help secure and protect your Personal Information from unauthorised access, use, disclosure, alteration, or destruction. You will appreciate, however, that we cannot guarantee the security of all transmissions or Personal Information, especially where human error is involved or malicious activity by a third party.

Notwithstanding the above, we will take reasonable steps to:

- (a) make sure that the Personal Information we collect, use or disclose is accurate, complete and up to date;
- (b) protect your Personal Information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
- (c) destroy or permanently de-identify Personal Information if it is no longer needed for its purpose of collection.

9.2 Accuracy

The accuracy of Personal Information depends largely on the information you provide to us, so we recommend that you:

- (a) let us know if there are any errors in your Personal Information; and
- (b) keep us up-to-date with changes to your Personal Information (such as your name or address).

We provide information about how you can access and correct your information in **Section 10**.

10. Access to and correction of your Personal Information

You are entitled to have access to any Personal Information relating to you which we hold, except in some exceptional circumstances provided by law (including the *Privacy Act 1988* (Cth)). You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If you would like access to or correct any records of Personal Information we have about you, you are able to access and update that information (subject to the above) by logging in to your account and viewing your information.

11. Resolving Privacy Complaints

11.1 Complaints generally

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

11.2 Contacting AACCP regarding complaints

If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your Personal Information, please contact us:

Telephone: 08 9228 0811
 Email: info@collaborativeaustralia.com.au
 Address: 2 Brook St, East Perth, Western Australia 6004

Please mark your correspondence to the attention of the Privacy Officer.

11.3 Steps we take to resolve a complaint

In order to resolve a complaint, we:

- (a) will liaise with you to identify and define the nature and cause of the complaint;
- (b) may request that you provide the details of the complaint in writing;

- (c) will keep you informed of the likely time within which we will respond to your complaint; and
- (d) will inform you of the legislative basis (if any) of our decision in resolving such complaint.

11.4 Register of complaints

We will keep a record of the complaint and any action taken in a Register of Complaints.

12. Consent, modifications and updates

12.1 Interaction of this Policy with contracts

This Privacy Policy is a compliance document prescribed by law rather than a legal contract between two or more persons. However, certain contracts may incorporate all, or part, of this Privacy Policy into the terms of that contract. In such instances, AACCP may incorporate the terms of this policy such that:

- (a) certain sections or paragraphs in this policy are incorporated into that contract, but in such a way that they do not give rise to contractual obligations onto AACCP, but do create contractual obligations on the other party to the contract; and
- (b) the consents provided in this policy become contractual terms provided by the other party to the contract.

12.2 Acknowledgement

By using our website, purchasing a product or service from AACCP, where you have been provided with a copy of our Privacy Policy or had a copy of our Privacy Policy reasonably available to you, you are acknowledging and agreeing:

- (a) to provide the consents given by you in this Privacy Policy; and
- (b) that you have been informed of all of the matters in this Privacy Policy.

12.3 Modifications and updates

We reserve the right to modify our Privacy Policy as our business needs require. We will take reasonable steps to notify you of such changes (whether by direct communication or by posting a notice on our website). If you do not agree to our continued use of your Personal Information due to the changes in our Privacy Policy, please cease providing us with your Personal Information and contact us via the details set out in **Section 11**.