



PRIVACY & SECURITY

Australian Loyalty Association (ALA) is committed to protecting your privacy and giving you the most powerful and safe online experience. The ALA is committed to protecting the privacy of personal information obtained through its operations as a registered organisation and industry association. The ALA is bound by the Privacy Act 1988 (Cth) (Privacy Act), including the Australian Privacy Principles (APPs), and any relevant privacy code registered under the Privacy Act.

The purpose of this policy is to generally inform people of:

- how and when we collect personal information and personal data;
- how we use and disclose personal information and personal data;
- how we keep personal information and personal data secure, accurate and up-to-date;
- how an individual can access and correct their personal information and personal data; and
- how we will facilitate or resolve a privacy complaint.

This Statement of Privacy applies to ALA assets and governs data collection and usage. By using the ALA website, you consent to the data practices described.

POLICY STATEMENT

The 13 Australian Privacy Principles apply to personal information, that is, information or an opinion (whether true or not) relating to an identified individual or which can be used to reasonably identify that individual. Please note that information about companies is not personal information. However, the principles will apply to an individual who is carrying on a business as a sole trader.

COLLECTION OF YOUR PERSONAL INFORMATION

ALA collects personally identifiable information for the following purposes: Enquiries about ALA offerings; provision of business advisory services and other similar business activities; marketing services and ALA events. ALA also collects personal information that is reasonably necessary for, or directly related to those purposes.

The specific types of personal information collected and held include the following:

- Full name;
- Company name/ Employer;
- Date of birth;
- Job title;
- Industry;
- Dietaries;
- Contact details such as address, email address;
- Business/ mailing address;
- Online interactions with our website, publications, alerts and social media activity.

There is also information about your computer hardware and software that is automatically collected by www.australianloyaltyassociation.com. This information can include:

- Your IP address,
- Browser type,
- Access times and referring Web site addresses.

This information is used by ALA for the operation of the service, to maintain the quality of the service, and to provide general statistics regarding the use of the ALA website.

HOW WE COLLECT PERSONAL INFORMATION

As much as possible, ALA only collects personal information that has been directly provided to us by our clients or prospective clients, associates of clients, our suppliers or potential suppliers, our employees or potential employees, or is otherwise available in the public domain where this information will assist us with the provision of services to our current and prospective clients. Information may have been provided verbally or in writing (including by email or through web forms).

ALA may from time to time collect personal information from alternative sources. Some examples of these alternative collection events are:

- when we collect personal information about you from third parties;
- personal information collected from your business card;
- when we collect information from you in order to provide you with services,
- when we collect personal information about you when you register to attend or attend an event; or
- when we collect personal information about you from publicly available sources such as social media platforms (such as LinkedIn, Facebook, Twitter, Google, Instagram etc.).

If ALA 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. In general, we will not tell you when we collect personal information about you in the following circumstances:

- Where information is collected from publicly available sources including but not limited to, searches on social media platforms (such as LinkedIn, Facebook, Twitter, Google, Instagram etc.); or
- As otherwise required or authorised by law.

Unsolicited information

In the event ALA collects personal information from you, or a third party, in circumstances where you have not requested or solicited that information (known as unsolicited information), and it is determined by ALA (in its absolute discretion) that the personal information is not required, we will destroy the information or ensure that the information is de-identified.

USE OF YOUR PERSONAL INFORMATION

ALA may at times use and disclose personal information about an individual for the “primary purpose” of collection (i.e. the dominant or fundamental purpose for which that information is collected).

As well as above mentioned purposes, that “primary purpose” includes facilitating our internal business processes, communicating with clients, prospective members and other external parties, providing ongoing marketing information about our products and services, complying with our legal obligations and dealing with enquiries and complaints.

In certain circumstances, the law may permit or require us to use or disclose personal information for

other purposes (for instance where a client would reasonably expect us to and the purpose is related to the purpose of collection).

We may use your personal information for the following:

- Enable our partners and sponsors to communicate and manage their relationship with you, including to direct market to you;
- Provide information to our partners and sponsors about your interaction with their communications, such as whether you have opened an email or clicked on a link.
- Inform you about other products and services offered by ALA in response to enquiries.
- Conduct our business, which includes internal administration and operations such as accounting, risk management, record keeping, archiving, testing and staff training develop new programs, products and services and improve our website. undertake planning, research, statistical analysis and database management;
- Fulfil our legal requirements such a disclosure to law enforcement agencies or the courts.

In the course of providing our services we may disclose personal information where necessary to employers, our insurers, to other professional advisers and in circumstances required by law.

This data is used to deliver customised content and advertising within ALA to customers whose behaviour indicates that they are interested in a particular subject area.

ALA websites will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on ALA or the site; (b) protect and defend the rights or property of ALA; and, (c) act under exigent circumstances to protect the personal safety of users of www.australianloyaltyassociation.com, or the public.

Sensitive information

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.

Our policy is that we attempt not to collect sensitive information about our clients or prospective clients, however that may not always be possible. If any of our clients or prospective clients elects to provide us with any sensitive personal information, we will take all reasonable steps to ensure that the sensitive information is securely protected.

DISCLOSURE OF PERSONAL INFORMATION

ALA will ordinarily make the following disclosures of your personal information where it is necessary to support the delivery of the client services or other related activities:

- Third-party service providers utilised in connection with any administrative matters;
- Service providers (including IT service providers and consultants) who assist ALA in providing or marketing our services;
- Related entities and related bodies corporate of ALA;
- Where ALA is required by law to provide personal information so that ALA complies with court orders, subpoenas or other legislation that requires us to provide personal information (for example, a garnishee order).

We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:

- 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;
- 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;
- If we have reason to suspect that unlawful activity has been, or is being, engaged in; or
- If it is required or authorised by law.

Should it be necessary for ALA to forward personal information to third parties outside the organisation, we will make every effort to ensure that the confidentiality of the information is protected.

In the event we propose to disclose such personal information other than for the reasons set out in this policy, we will first notify you or seek your consent prior to such disclosure.

If you have received communications from us and you no longer wish to receive those sorts of communications, you should unsubscribe to these communications, and we will ensure the relevant communications cease.

DIRECT MARKETING

By engaging with the ALA you give your express and informed consent to us using your personal information where that information relates to the provision of services to you or marketing activities 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).

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.

If at any time you do not wish to receive any further Direct Marketing Communication, you may ask us not to send those to you or disclose your information to other organisations for that purpose by using the "unsubscribe" facility in the Direct Marketing Communications.

USE OF COOKIES

The ALA website may use "cookies" to help you personalise your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to

provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page.

When you return to the website, the information you previously provided can be retrieved, so you can easily use the www.australianloyaltyassociation.com features that you Customised. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of www.australianloyaltyassociation.com

SECURITY OF YOUR PERSONAL INFORMATION

ALA secures your personal information from unauthorised access, use or disclosure in a controlled, secure environment.

Once we collect your personal information, we will either hold it securely and store it on 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.

ALA will take all reasonable steps to protect against the loss, misuse and/or alteration of the information under its control, and that the information it holds is accurate, complete and up to date including through appropriate physical and electronic security strategies.

Only authorised ALA personnel are provided access to personal information, and these employees are required to treat this information as confidential. We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will destroy or permanently de-identify these records.

ACCURACY OF PERSONAL INFORMATION

ALA will take all reasonable steps to make sure that any personal information collected, used or disclosed is accurate, complete and up to date. As the accuracy of personal information largely depends on the information that you provide to us, we request that you advise us of any errors in or updates required to your personal information. If you believe that the information we hold about you is inaccurate or out of date, you may contact us and we will update the relevant information accordingly.

ACCESS TO PERSONAL INFORMATION

Under the Australian Privacy Principles, you have the right to request access to any personal information that we may hold about you and to advise us if the information should be corrected. The Australian Privacy Principles set out the circumstances when we can refuse those requests. If we do refuse your request, we will provide you with a written notice that sets out the reasons (unless it would be unreasonable to provide them to you).

Subject to our right to refuse access, ALA will provide you with a report that lists any personal information that we may hold about you.

Our policy is to provide written acknowledgement of our receipt of any request for access to personal information or a request for correction of personal information within 7 days of the request being received. We will then provide a written response within 30 days of our receipt of the request. If you would prefer to submit a privacy request using a pseudonym or otherwise keep your identity secret, ALA will do its best to support that request if it is feasible to do so under the circumstances.

CONTACT INFORMATION

For more information on how we handle your personal information, or if you are concerned that we may have breached your privacy and wish to make a complaint, please contact us by sending an email, enquiries@australianloyaltyassociation.com. We will respond to your query or complaint by emailing you at the email address we have on file, as this way we can ensure that we are dealing with the correct individual. ALA will investigate your complaint and will notify you of a decision in relation to your complaint as soon as practicable after it has been made.

If you are not happy with our response, you can contact the hotline of the Office of the Australian Information Commissioner (OAIC) on 1300 363 992 to make a query about your privacy rights, or to lodge a complaint about how we have handled your personal information. The OAIC has the power to investigate the matter and make a determination.

OUR CONTACT DETAILS

Australian Loyalty Association (ALA)
Unit 11 / 350 Bridge Street, Port Melbourne, VIC, 3207
Email: enquiries@australianloyaltyassociation.com
Phone: (+61) 438 92 33 00

CHANGES TO THIS STATEMENT

ALA will occasionally update this Statement of Privacy without notice to reflect company and customer feedback and the law.

COMPLAINTS

We will ensure that all complaints and enquiries 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 (in respect of a complaint).

If you wish to make an enquiry about your personal information at ALA, or make a complaint because you believe that we may have breached the Australian Privacy Principles or a privacy code that applies to us, please contact us directly.

In order to resolve a complaint, we:

- Will liaise with you to identify and define the nature and cause of the complaint;
- May request that you provide the details of the complaint in writing;
- Will keep you informed of the likely time within which we will respond to your complaint; and

- Will inform you of the legislative basis (if any) of our decision in resolving such complaint.
We will respond to each request within a reasonable time.

If a party has lodged a complaint with ALA and is not satisfied with our response, they may contact the Office of the Australian Information Commissioner.