

NFIA Privacy Policy

Parent Policy (if any)	N/A
Effective Date	9 May 2022
Version	01
Applies to	National Fire Industry Association of Australia Ltd (NFIA) ACN: 618 984 599

1 Purpose

- 1.1 The NFIA is committed to conducting the affairs of the NFIA with integrity and in the interests of its Members and Industry stakeholders.
- 1.2 If we deal with you as a current or prospective Member or stakeholder, we may collect personal information from you in order to provide any of our products or services to you. Information is only collected where it is reasonably necessary for, or directly related to, one or more of the products or services we provide, or functions the NFIA carries out.
- 1.3 The NFIA is committed to protecting privacy and processing personal information fairly and lawfully in compliance with Australian federal and state privacy laws as applicable.
- 1.4 This Policy sets out how the NFIA collects, stores, uses, discloses, and otherwise manages the personal information that it receives or creates about individuals.
- 1.5 The Policy is built upon strategies, procedures, practices, and quality systems which support the delivery of the NFIA's business functions. The NFIA Board of Directors and staff who have a role in delivering the NFIA's governance functions are to provide timely and accurate delivery against strategies, procedures and practices involving personal and/or private data from all NFIA Stakeholders (Members, suppliers, website users, etc).

2 Scope

- 2.1 The NFIA Privacy Policy applies to the NFIA, in the context of **personal information**.
- 2.2 For the purpose of this Policy, **personal information** means "*information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not*".¹

3 Interpretation

- 3.1 In the construction and interpretation of this Policy (where the circumstances require):-
 - 3.1.1 one gender includes the other gender;

¹ [Privacy Act 1988 \(Cth\)](#) (the Act) s.6.

- 3.1.2 the singular includes the plural and the plural includes the singular;
 - 3.1.3 a person includes a body corporate;
 - 3.1.4 a party includes the party's related bodies corporate, related partnerships, related trusts, directors, the members of its Board of Management, its officers, employees and agents, liquidators, receivers and managers, trustee in bankruptcy, administrators, executors, successors and permitted assigns;
 - 3.1.5 headings are for convenience only and do not form part of this policy or affect its interpretation; and
 - 3.1.6 where a word or expression is given a particular meaning, parts of speech and grammatical forms of that word or expression have a corresponding meaning.
- 3.2 The NFIA may be referred to in this document as “we”, “us” or “our”.
- 3.3 **Website** relates to the <https://nfia.com.au/> website, operated by the NFIA.
- 3.4 Where this Policy refers to NFIA “products”, “services”, or “functions”, it may mean any of the NFIA’s products, services, or functions including, without limitation: membership services; advocacy and lobbying; technical advice; industrial relations and safety advice; training and professional development; Industry specific news; events; and networking opportunities.

4 Policy Statement

- 4.1 The NFIA’s Privacy Policy explains what the NFIA does to protect the personal data provided to the NFIA to fulfil its activities effectively and accountably to our Industry and associated stakeholders.
- 4.2 To discuss any privacy related queries, including regarding the operation of this Policy, please contact the Chief Executive Officer via info@nfia.com.au.

Acceptance of Privacy Policy

- 4.3 By using any NFIA website, product or service, agreeing to the terms and conditions of any NFIA user account, training account, or product, providing services to the NFIA, becoming a Member of the NFIA, or otherwise providing your personal information to us, you confirm that you have read and agree to this Privacy Policy.

Policy Amendments

- 4.4 The NFIA will review this Policy periodically and may modify or update it at any time.
- 4.5 Changes to this Privacy Policy will take effect immediately upon such changes being uploaded to our website.
- 4.6 Your continued use of NFIA products and services following such upload will constitute your acceptance of these changes.

5 What information does the NFIA collect and hold?

- 5.1 The kind of information the NFIA collects and holds depends on the nature of your dealings with the NFIA and on the requirements of applicable laws, regulations, licence conditions and rules applying to us.
- 5.2 This section provides examples of the kinds of information the NFIA may collect and hold about you. This list is not exhaustive. For example, the types of personal information we may collect from you include, but is not limited to:
 - 5.2.1 your name, residential and postal address, date of birth, email address, mobile telephone number, signature, and other contact details;
 - 5.2.2 copies of documents confirming your identity, such as your driver's licence, birth certificate and passport;
 - 5.2.3 images or videos;
 - 5.2.4 your occupation and place of work;
 - 5.2.5 your gender, credit card or bank account details;
 - 5.2.6 IP address, location when using our products and services, and recordings of phone calls between you and us;
 - 5.2.7 any photos, videos, or feedback you share with us;
 - 5.2.8 information about our shareholders, if any, including bank account details, security holder identification number and tax file number or ABN exemption;
 - 5.2.9 if you wish to be, or are, or have been, employed, contracted, or otherwise engaged by the NFIA as part of its workforce (directly or indirectly, e.g. as an employee of a labour supply company), the NFIA may collect and hold personal information about you which may include name, residential and postal address, email address, telephone number, citizenship/migration/visa status, tax file number, copies of pay slips, proof of wage/superannuation payments, your academic results and qualifications, expertise experience, employment history, current salary and salary expectations, and background information such as whether you are a politically exposed or sanctioned person;
 - 5.2.10 if you're a supplier of goods or services to the NFIA, or are employed or engaged by such a supplier, the NFIA may collect and hold personal information about you, including name, position, business and email address, telephone number, and background information about you;
 - 5.2.11 if you acquire goods or services from the NFIA or are employed or engaged by an entity which does, the NFIA may collect and hold personal information about you, including name, position, business and email address, telephone number, and background information about you including, for example, your credit history;
 - 5.2.12 if you register or enrol to participate in an NFIA training program, the NFIA may collect and hold personal information including your name, position, residential and email address, date of birth, telephone number, copies of documents confirming your identity such as your driver's licence, passport and birth certificate, gender, information about qualifications and other training you're undertaking or have completed, your credit card and bank details (if you need to pay directly for

programs), and background information about you including, for example, your credit history; and

5.2.13 any other information we consider necessary to provide our services.

- 5.3 If you open or use an account with us using your mobile device, you consent to us collecting your personal information via your mobile device.
- 5.4 We may also use cookies (pieces of data sent by a website to your computer and stored on the hard drive) to offer our products and services to you directly, and to customise our websites.
- 5.5 The NFIA may use and disclose such information in accordance with this Privacy Policy.
- 5.6 The NFIA may search government records, credit listing agencies, and publicly available sources, including social media and other internet sources, for background information about you. The NFIA requires background information as part of its assurance program on the identity, honesty, and integrity of prospective and current employees, and as part of its supplier and customer due diligence activities.
- 5.7 Background checks may require the NFIA to disclose information about you to certain regulators and other third parties.

Members

- 5.8 The NFIA collects key business information about Member, and potential Member, organisations. Such information may include name, address, contact information, business size and number of employees, ABN, etc.
- 5.9 The primary purpose for collecting the information is to maintain membership records and to provide a compliant and accurate service for NFIA membership activity. Data will be collated and held on a secure platform designed to communicate to Members as part of the paid membership benefits. Data may also be reviewed by the NFIA Board, Committee of Management and Chief Executive Officer (**CEO**) in order to support the strategic direction of the NFIA.
- 5.10 If a Member chooses not to provide the information requested, it may not be possible for NFIA to provide an NFIA membership, or it may limit benefits and assistance available to a prospective Member.

NFIA Employees

- 5.11 The NFIA collects personal information about potential employees and employees throughout employment. Such information may include name, date of birth, address, tax file number, banking and superannuation details, qualifications, referee reports, details of work history, and other information relevant to employment and work matters.
- 5.12 Health information may be collected when an employee commences work as part of the NFIA's occupational health and safety monitoring.
- 5.13 The information is often collected from several sources. For instance, an employee may provide the NFIA with information when completing employment forms. Others, such as previous employers and nominated referees, other staff members, and students, may also provide the NFIA with information about employment history and work-related matters.

5.14 The primary purpose for collecting the information is to maintain employee records and to administer employment, salary, and superannuation, and to provide a safe workplace.

5.15 If an employee chooses not to provide the information requested, it may not be possible for the NFIA to administer their employment.

Website & Social Media Users

5.16 The NFIA collects several different types of information for various purposes to provide and improve its website and social media service to users. The NFIA is guided by the following principles to manage this activity. Types of data collected include personal information as well as cookies and usage data.

5.17 The NFIA may use a user's personal information to contact them with newsletters, marketing or promotional materials and other information that may be of interest to the user. A user may opt out of receiving any, or all, of these communications from the NFIA by contacting the NFIA or following an available unsubscribe link in the communication.

5.18 The NFIA may collect information on how the Website is accessed and used (**usage data**). Usage data is collected automatically, either generated by the use of the Website, or from the Website infrastructure itself (e.g. the duration of a page visit). This usage data may include information such as the user's computer's Internet Protocol (**IP**) address, browser type, browser version, the pages of NFIA's Website that the user visits, the time and date of user visit, the time spent on those pages, unique device identifiers and other diagnostic data.

5.19 The NFIA may use cookies and similar tracking technologies to track the activity on the NFIA's Website and the NFIA holds certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier, stored on a user's device. Cookies allow a website to identify and interact with your computer. The information stored in cookies may be used to offer our products and services directly to you and customise and improve our websites. Cookies are sent to a user's browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags, and scripts to collect and track information and to improve and analyse the NFIA's Website.

5.20 A user can instruct their browser to refuse all cookies or to indicate when a cookie is being sent. However, if a user does not accept cookies, the user may not be able to use some portions of the NFIA's Website.

5.21 Examples of cookies the NFIA may use:

5.21.1 *Session Cookies*: The NFIA may use Session Cookies to operate the NFIA's Website.

5.21.2 *Preference Cookies*: The NFIA may use Preference Cookies to remember a user's preferences and various settings.

5.21.3 *Security Cookies*: The NFIA may use Security Cookies for security purposes.

Information about Online Behaviour & Location Data

5.22 The NFIA may collect information regarding your online behaviour, including:

- 5.22.1 your engagement with correspondence, promotions, giveaways, competitions and advertising;
- 5.22.2 the time, date and URL of each request for a page from our web server and other web servers assisting us (including the times that you log in to any account to help ensure the security of your account and to help verify that the person operating the account is you), plus information on the browser software being used to make the request;
- 5.22.3 'click stream' information from your use of our websites (such as information about areas of our websites you've accessed and the time and date of access);
- 5.22.4 double-click ad serving information from your use of our websites (such as information about whether a marketing campaign has been effective);
- 5.22.5 information about your preferences relating to the use of our websites; and
- 5.22.6 information from the computer or device that you are using, such as your IP address, allowing us to: analyse trends, administer our websites, track your web navigation, and gather broad demographic information for aggregated use.

5.23 To collect this information, the NFIA may use cookies.

5.24 We may also collect information about your location when you use our products and services. The kinds of location data we collect depends on the platform you are using and your account settings.

6 How the NFIA Collects Personal Information

6.1 The NFIA will usually collect your personal information directly from you via our websites, applications, or telephone recordings, electronically, by mail or in person. However, we may collect information from a third party if it isn't reasonable or practical to collect it from you or if it is provided to us or is necessary to satisfy our legal obligations.

6.2 For example, we may collect your personal information from:

- 6.2.1 a company that supplies products or services to us;
- 6.2.2 a referee nominated by you when you apply for a job with us;
- 6.2.3 public sources (e.g. social media sites, Google, and other websites); and
- 6.2.4 regulatory bodies and any other government authorities or agencies.

7 How We Use and Disclose Personal Information

7.1 The NFIA collects, holds, uses, and discloses your personal information for purposes required or permitted by law, and which are reasonably necessary to carry out the NFIA's business functions or activities. Purposes may include, without limitation: to –

- 7.1.1 identify you and verify your identity;
- 7.1.2 deliver to you, and assist in the management of, various products and services;

- 7.1.3 analyse, develop and improve NFIA's products and services offerings;
- 7.1.4 audit, market research, and internal training;
- 7.1.5 provide you with information about other products and services the NFIA offers, and with information relevant to you personally and/or your type of business or other area of interest or expertise;
- 7.1.6 provide you with news, special offers, and general information about other services and events which the NFIA offers;
- 7.1.7 meet the NFIA's legal and regulatory requirements;
- 7.1.8 ensure the security of any user account you may hold with the NFIA;
- 7.1.9 identify your behaviour, habits, and preferences;
- 7.1.10 manage, administer, and control the quality of the products and services the NFIA provides;
- 7.1.11 facilitate internal business operations, including the fulfilment of any legal requirements;
- 7.1.12 consider you for employment;
- 7.1.13 prevent, detect, and address technical issues;
- 7.1.14 protect our rights and property and those of any NFIA Member or user;
- 7.1.15 maintain a register of NFIA Members;
- 7.1.16 market the products and services of selected 3rd party partners, and enable 3rd party partners to market products and services to you;
- 7.1.17 regarding the website:
 - 7.1.17.1 provide and maintain the Website;
 - 7.1.17.2 monitor the usage of the Website;
 - 7.1.17.3 notify users about changes to the Website;
 - 7.1.17.4 allow users to participate in interactive features of the Website when a user chooses to do so;
- 7.1.18 assist you with enquiries or complaints, and provide user and member support; and
- 7.1.19 satisfy any other purpose required or permitted by law.

7.2 In order to perform the functions and activities outlined above, the NFIA may disclose your personal information to any of the persons or organisations described below:

- 7.2.1 our related entities (if any) to facilitate our and their internal business processes;

- 7.2.2 third party service providers, who assist us in operating our business (including credit reporting bodies, cloud storage providers, payment facility providers, software providers and technology service providers), and in this instance we will take all reasonable steps to ensure those other persons to respect your right of privacy;
 - 7.2.3 our related entities and other organisations with whom we have affiliations so that those organisations may provide you with information about services and various promotions;
 - 7.2.4 organisations involved in maintaining, reviewing, upgrading and developing our computer and business systems;
 - 7.2.5 our financial advisers, legal advisers or auditors;
 - 7.2.6 organisations involved in a corporate re-organisation or involved in a transfer of all or part of the assets or business of our organisation;
 - 7.2.7 organisations involved in the payments systems including financial institutions, merchants and payment organisations;
 - 7.2.8 organisations required to assist us discharge our legal requirements;
 - 7.2.9 as required or authorised by law or a court/tribunal order; and
 - 7.2.10 where you have given your consent.
- 7.3 There may be other third parties to which we give personal information (for example, professional advisors or insurers) where required or permitted by law.
- 7.4 The NFIA may use or disclose personal information under the following circumstances:
- 7.4.1 for the purpose for which it was collected;
 - 7.4.2 for a related purpose which there is a reasonable expectation for disclosure;
 - 7.4.3 where consent has been provided to the disclosure;
 - 7.4.4 if NFIA are required or permitted to do so by law; or
 - 7.4.5 where NFIA have engaged a contracted service provider or partner to perform legitimate functions on our behalf, such as those outlined in this statement.
- 7.5 By agreeing to the terms and conditions for your NFIA user account you consent to this disclosure, but you may withdraw that consent at any time. Your consent to this will last indefinitely (including after your NFIA account is closed) unless and until it is withdrawn in writing.

Law Enforcement & Legal Obligations

- 7.6 The NFIA may be required to disclose information if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).
- 7.7 The NFIA may disclose data in the good faith belief that such action is necessary to:
- 7.7.1 comply with a legal obligation;

- 7.7.2 protect and defend the rights or property of the NFIA;
- 7.7.3 prevent or investigate possible wrongdoing in connection with the Website;
- 7.7.4 protect the personal safety of users of the Website or the public; or
- 7.7.5 protect against legal liability.

7.8 We may also be required to collect personal information for the purpose of investigations by law enforcement agencies like the Australian Federal Police, State Police Forces, the Australian Competition and Consumer Commission, the Australian Securities and Investments Commission and the Australian Crime Commission.

Employees & Contractors

7.9 We may disclose personal information to our employees and contractors, as needed to perform their jobs or provide their services (they have obligations to treat the personal information they access as confidential).

Service Providers

7.10 We may disclose personal information to organisations that assist us to:

- 7.10.1 check your name against government or other watch lists (e.g. if you're the subject of economic sanctions imposed by the government);
- 7.10.2 provide, manage and administer our products and services, our business and our business systems (including mailing houses, printers, public relations and advertising agencies, postal services, call centres, product development consultants, providers of customer relationship management (**CRM**) and affiliate management services, auditors, lawyers, providers of fraud detection services, IT technicians and software providers, IT consultants, website developers, providers of services to support our training programs, providers of payment processing services, data centre providers and providers of technology platforms);
- 7.10.3 develop and market our products and services (including market research analysts);
- 7.10.4 comply with Industry standards and securely manage processing of your credit card payments and storage of your credit card details;
- 7.10.5 analyse trends and aggregated demographic information, and target your interests; and
- 7.10.6 inspect, cleanse, transform and model such personal information for the purpose of discovering useful information, informing conclusions, and supporting decision making within the NFIA, whether you are a current supplier, user, employee or contractor.

7.11 The NFIA may employ third party companies and individuals to facilitate the Website, provide the Website on the NFIA's behalf, perform Website-related services, or assist the NFIA in analysing how its Website is used.

7.12 These third parties have access to user's information only to perform these tasks on the NFIA's behalf and are obligated not to disclose or use it for any other purpose.

7.13 The NFIA may use the services of data processors or service providers in order to process user data more effectively.

7.14 Analytics:

7.14.1 The NFIA may use third-party service providers to monitor and analyse the use of its Website.

7.14.2 Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of the Website. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads on its own advertising network.

7.14.3 A user can opt-out of having made activity on the Website available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

7.14.4 For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

7.15 Behavioural Remarketing:

7.15.1 The NFIA may use remarketing services to advertise on third party websites to a user after visiting our Website. The NFIA and its third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Service.

7.15.2 Google Ads (AdWords)

7.15.2.1 Google Ads (AdWords) remarketing service is provided by Google Inc.

7.15.2.2 A user can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

7.15.2.3 Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

7.15.2.4 For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

7.15.3 Facebook

7.15.3.1 Facebook remarketing service is provided by Facebook Inc.

- 7.15.3.2 To opt-out from Facebook's interest-based ads, follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>
- 7.15.3.3 For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

Regulators & Industry Bodies

7.16 We may disclose your personal information to:

- 7.16.1 regulators and law enforcement agencies;
- 7.16.2 respond to an enquiry from a government agency under state, territory or Commonwealth laws; and
- 7.16.3 any other relevant Commonwealth, State and Territory government authorities and agencies.

Marketing

7.17 We may use and disclose your personal information to send you marketing communications and show you advertisements that are personal and relevant, including to:

- 7.17.1 let you know about upcoming events, training programs, promotions, offers and new or updated products/services and other opportunities; and
- 7.17.2 inform you of marketing and promotional offers.

7.18 We may contact you via direct mail, email, SMS text message, push notifications on your device (if you have these enabled on your device), MMS and/or phone calls, targeted online advertising on websites and digital platforms and personalised advertising on our websites and apps.

7.19 We may ask for your consent to send you marketing communications. You will be able to unsubscribe, opt-out or hide marketing communications via the channel or platform (as applicable) that you receive those marketing communications on. We will promptly action any opt-out request. You can also opt-out from future marketing communications at any time.

7.20 If you consent to receiving marketing communications from the NFIA, you also consent to receiving marketing material from our third-party partners, but you may withdraw that consent at any time. To withdraw your consent, follow the instructions in the advertising material or on the third party's website.

7.21 We may use and disclose your personal information to:

- 7.21.1 our related companies, so they can comply with their obligations under laws, licence conditions and rules and can directly market to you; and
- 7.21.2 our business partners and other third parties so they can send you offers and information about their products and services.

Replacement Providers

- 7.22 So that a product or service can continue to be provided to you, or where another business can offer a similar product or service, the NFIA may disclose personal information to another business if the NFIA:
- 7.22.1 transfers responsibility for providing a NFIA product or service to another business; or
 - 7.22.2 stops providing a NFIA product or service (or limits it), and another business continues to offer a similar product/service.

Monitoring & Recording Telephone Calls

- 7.23 We may record various types of telephone calls and use these recordings for regulatory, verification and quality purposes.
- 7.24 We may disclose the details of your telephone calls with us to enforcement agencies, regulators and external advisors.
- 7.25 The NFIA may use 3CX (<https://www.3cx.com/>), or similar software. This software may record various phone calls.

Data Transfer

- 7.26 If the NFIA is involved in a merger, acquisition or asset sale, a user's data may be transferred. The NFIA may provide notice before data is transferred and becomes subject to a different Privacy Policy.

8 What happens if the NFIA doesn't collect your personal information?

- 8.1 If we're unable to collect your personal information, we may not be able to provide our products and services to you and/or any user account that you may hold may not perform properly.

9 Security of Personal Information

- 9.1 The NFIA takes privacy seriously and takes reasonable measures to protect the personal information it holds from misuse, interference, loss, unauthorised access, modification, and disclosure.
- 9.2 These precautions may include, for example:
- 9.2.1 password protection using Industry standard encryption;
 - 9.2.2 measures to preserve system security and restrict unauthorised access; and
 - 9.2.3 back-up systems to reduce the risk of accidental or malicious loss of data.
- 9.3 Data security is important to the NFIA. However, no method of transmission over the internet, nor method of electronic storage, is 100% secure. Whilst the NFIA strives to use commercially acceptable means to protect data, the NFIA cannot guarantee its absolute security.
- 9.4 The NFIA may use third party providers to store personal information electronically; the NFIA takes reasonable steps to ensure this information is held securely.

- 9.5 Unfortunately, there is always risk involved in sending information through any channel over the internet. When an individual transmits information over the internet, they do so entirely at their own risk.
- 9.6 The NFIA holds personal information in electronic and paper-based form in multiple systems. Personal information is treated the same as any other provided information, regardless of geographic location or jurisdiction. The NFIA takes all reasonable steps to ensure that any personal information the NFIA (or contracted service providers operating on our behalf) transmits, stores or otherwise processes, is accurate and complete, and that appropriate technical and organisational measures are implemented and maintained to protect personal information from accidental or unlawful destruction, misuse, loss, alteration, or unauthorised access or disclosure.
- 9.7 Personal information collected and processed by the NFIA may be transferred interstate and may be transferred outside of Australia, particularly where the NFIA's contracted service providers are not located in Australia. The NFIA takes all reasonable steps to ensure that the interstate or overseas transfer of personal information is in accordance with this Policy and applicable laws.

10 How can I access and correct my personal information?

- 10.1 The NFIA will take reasonable steps to ensure the personal information we collect about you or that we use or disclose is accurate, up-to-date, and complete.
- 10.2 Please let us know if there's a change to any of the details you have given to us. You can ask for access to, or to correct, personal information the NFIA holds about you, or make a privacy complaint, by contacting the Chief Executive Officer via info@nfia.com.au.
- 10.3 The NFIA will need to verify your identify before responding to requests.
- 10.4 The NFIA will usually respond to you within seven days of receiving your request.
- 10.5 In some circumstances, the NFIA may decline to grant you access to the personal information we hold about you, for example, if we reasonably believe that the release of information would pose a serious threat to the life, health or safety of an individual, would have an unreasonable impact on the privacy of other individuals, denying access is required or authorised by law, legal proceedings are underway, negotiations may be prejudiced by such access, or if we consider the request to be frivolous or vexatious.
- 10.6 It's not always possible to remove or modify information in databases, but the NFIA will take reasonable steps to correct your personal information to ensure that it's accurate, up-to-date, complete, relevant and not misleading.
- 10.7 In some circumstances, the NFIA may decide not to agree to a request to correct personal information. The NFIA will inform you in writing why we have not agreed to the request.
- 10.8 If the NFIA declines to make your requested correction, you may request the NFIA to attach to your personal information a statement that it is inaccurate, out-of-date, incomplete, irrelevant or misleading. The NFIA will take reasonable steps to do this. If the NFIA disclosed your personal information to a third party before correcting it, you may request the NFIA to notify the third party of the correction the NFIA has made. The NFIA will take reasonable steps to do so unless this would be impractical or unlawful. There is no charge to request a correction, for making a correction or for attaching a statement to a record.

11 Complaints

- 11.1 If you have a concern about the NFIA has handled your personal information, please let us know.
- 11.2 Should you wish to make a complaint about the management of your personal information, please contact the Chief Executive Officer via info@nfia.com.au.
- 11.3 To lodge a formal complaint, please send details to the NFIA in writing. We'll attempt to respond within a reasonable time, usually 30 days.
- 11.4 The NFIA may ask individuals to verify their identity before responding to complaints.
- 11.5 The NFIA treats all privacy complaints seriously and any complaint will be assessed with the aim of resolving the issue in a timely and efficient manner.
- 11.6 We request that you cooperate with us during this process and provide us with any relevant information that we may need to investigate the complaint.
- 11.7 If your complaint is not resolved, you can refer it to the Office of the Australian Information Commissioner: Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2001 Australia.

12 Disclosure Of Personal Information to Other Jurisdictions

- 12.1 The NFIA may disclose your personal information to recipients located outside Australia that provide services to us. This may include recipients located in countries which do not comply with Australian privacy law frameworks, nor any equivalent privacy requirements.
- 12.2 For example, we may disclose your personal information to overseas third parties who provide customer relationship management services, identification and fraud detection services, cloud and data storage services, IT support services and other third-party services to us. The NFIA may use cloud storage to store the personal information we hold about you. The cloud storage providers and the IT servers may be located outside Australia.
- 12.3 Users' information may be transferred to — and maintained on — computers located outside of the user's state, country or other governmental jurisdiction where the data protection laws may differ from those of the user's jurisdiction.
- 12.4 If a user is located outside Australia and chooses to provide information to the NFIA, please note that the NFIA may transfer the data to Australia and process it there.
- 12.5 A user's consent to this Policy, followed by a submission of such information, represents a user's agreement to that transfer.
- 12.6 The NFIA will take all the steps reasonably necessary to ensure that a user's data is treated securely and in accordance with this Policy and that no transfer will take place to an organisation or a country unless there are adequate controls in place including the security of a user's data and other personal information.
- 12.7 By accepting or using of any of our services whether in writing, orally, or electronic, you agree that you consent to the disclosure of your personal information in accordance with this Policy, including potentially to an overseas recipient (such as, but not necessarily limited to, a cloud storage service provider) not bound by Australian legal frameworks concerning privacy, or a law

or binding scheme that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way the information is protected by the Australian privacy law framework.

13 Sensitive Information

- 13.1 The NFIA will only collect sensitive information from you with your consent.
- 13.2 Sensitive information is personal information that includes information relating to your racial or ethnic origin, religious or philosophical beliefs, sexual orientation, criminal history, or health information.

14 How long will the NFIA keep your personal information?

- 14.1 Typically, the NFIA will only retain personal information for as long as it is required for the purposes set out in this Privacy Policy, and in accordance with its other legal obligations, to resolve disputes, and enforce its legal agreements and policies. This information is then securely destroyed.
- 14.2 Usage Data may be retained for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of the NFIA's Website, or the NFIA is legally obligated to retain this data for longer periods.
- 14.3 The NFIA will take reasonable steps to destroy personal information or ensure it is deidentified after a reasonable time, if the NFIA:
 - 14.3.1 no longer needs to use or disclose your personal information for any purpose that's authorised under law, this privacy policy, or otherwise in writing; and
 - 14.3.2 is not legally required to retain that information.

15 Links to Other Sites

- 15.1 The NFIA's website may contain links to other sites that are not operated by NFIA. If website users click a third-party link, they will be directed to that third party's site. The NFIA recommends that users review the privacy policy of each site they visit.
- 15.2 The NFIA has no control over, and assumes no responsibility for, the content, privacy policies or practices, or the content of any third-party sites or services.

16 Responsibilities

- 16.1 The NFIA Board of Directors and CEO are accountable for the management and accountability directives listed in this Policy.
- 16.2 The CEO is responsible for:
 - 16.2.1 establishing this Policy, subject to Board of Directors and Committee of Management approval;
 - 16.2.2 managing this Policy's implementation; and

16.2.3 monitoring, reviewing and ensuring compliance with this Policy.

16.3 No additional reporting is required.

17 Approval & Review

Last Modified	6 May 2022
Approved By	Adrian Shackleton
Approval Date	6 May 2022
Next Review Date	6 May 2023
Review Responsibility	Chief Executive Officer

Approval & Amendment History

Version	Approval Authority	Date
1	Adrian Shackleton	6 May 2022