

# PRIVACY POLICY

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|--------------------|---------------|-----------------------|----------|
| Version            | 2             | Approved by Board on  | May 2023 |
| Responsible person | Tanya Wheeler | Scheduled review date | 2025     |

## INTRODUCTION

The Board of the Australian Alpaca Association is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

## PURPOSE

The purpose of this document is to provide a framework for Australian Alpaca Association in dealing with privacy considerations.

## POLICY

Australian Alpaca Association collects and administers a range of personal information for the purposes of:

- management of the eAlpaca database relating to alpaca ownership, husbandry and breeding and any other alpaca business related activities;
- administering and managing the AAA services and shows; and
- providing members with information about AAA activities, events and shows.

The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

Australian Alpaca Association recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. Though the AAA is exempt from the Australian Privacy Principles in the Commonwealth Privacy Act, as it is a small business, the AAA respects and upholds the rights of individuals to privacy in relation to personal information.

Australian Alpaca Association is bound by laws (other than the Australian Privacy Principles) which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

Australian Alpaca Association will

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

REVIEW This Policy shall be reviewed within 3 months.

# PRIVACY PROCEDURES

## RESPONSIBILITIES

The Board is responsible for developing, adopting and reviewing this policy.

The Office is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

### Collection

Australian Alpaca Association will:

- Only collect information that is necessary for the performance and primary function of the AAA.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent. (Sensitive information includes, but is not limited to health information and information about religious beliefs, race, and gender

### The information we collect

The AAA collects personal information in by various ways, including:

- directly from you, when you provide information by phone, email, or in documents such as an application form;
- from publicly available sources of information;
- from our own records;
- when legally required to do so;
- information arising from surveys and general feedback;
- from members of the public who are prospective AAA members.

### Use and Disclosure

Australian Alpaca Association will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.

For other uses, Australian Alpaca Association will obtain consent from the affected person.

- In relation to a secondary purpose, use or disclose the personal information only where:
  - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for the secondary purposes or
  - the person has consented; or

- other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety. In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and AAA has provided an opt-out option and the opt-out option has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented.
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorized by law to refuse and,
- Where for a legal or other reason AAA is not required to provide a person with access to the information, AAA may consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

### **Storage**

Australian Alpaca Association will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- Before AAA discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. AAA will have systems which provide sufficient security.

### **Destruction and de-identification**

Australian Alpaca Association will:

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information AAA holds and will not use any government related identifiers unless they are reasonably necessary for AAA functions.

### **Data Quality**

Australian Alpaca Association will:

- Take reasonable steps to ensure the information it collects and holds is accurate, complete, up to date, and relevant to the functions it performs.

### **Data Security and Retention**

Australian Alpaca Association will:

- Only destroy records in accordance with **any relevant State and/or Federal Legislations.**

### **Openness**

Australian Alpaca Association will:

- Ensure stakeholders are aware of AAA's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

## **Access and Correction**

Australian Alpaca Association will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.
- if a person is able to establish that the personal information is not accurate, then AAA must take steps to correct it. AAA may allow a person to attach a statement to their information if AAA disagrees it is inaccurate.

## **Anonymity**

Australian Alpaca Association will:

Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

## **Making information available to other organisations**

Australian Alpaca Association can:

Release information to third parties where it is requested by the person concerned or is legally required.

## **PRIVACY POLICY – EXPLANATION TO MEMBERS.**

This document explains our policy for the collection, use and disclosure of personal information

The AAA undertakes not to interfere with an individual's privacy rights in the way it collects, uses or discloses the personal information of any persons who provide it with such information in the course of the AAA carrying out its purposes and objectives.

## **Privacy Choices**

When you join the AAA or renew your membership, you are given privacy choices:

- you can have your details not available to other members on eAlpaca by marking them private;
- you can opt out of receiving electronic information from the AAA except in relation to your activities in the IAR database.

## **How we use the information**

Your personal information may be used by the AAA in order to:

- inform you of AAA activities in which you may wish to be involved;
- provide the services you require;
- enter you into AAA competitions, promotions and events;
- administer and manage AAA services.

## **Who we share your information with**

Your personal information is shared with:

- Simplify Solutions Pty Ltd (ABN 56 155 396 599) for the purpose of maintaining the International Alpaca Register (IAR) on eAlpaca. Members can manage their own privacy settings within eAlpaca or request the AAA to make changes on their behalf;
- Other AAA members
- Financial institutions for payment processing;
- Publishers of our newsletters;
- IT and data storage providers;
- Contracted service providers.

The AAA will only send you emails if you have elected to receive such emails or if they are in response to an email, we have received from you.

The AAA will also disclose information if they are legally bound to.

### **Security**

The AAA will take reasonable steps to ensure that personal information is secure from any misuse or unauthorised access or disclosure.

If you have any queries or concerns about your personal information which the AAA maintains, or wish to correct any of your personal information, please send the details to [info@alpaca.asn.au](mailto:info@alpaca.asn.au).