

**INSTITUTE OF PROFESSIONAL ORGANISERS
IOPO PTY LTD
(ACN 618 738 293)**

PRIVACY POLICY

1. OUR PRIVACY POLICY

- 1.1. It is the policy of the IOPO to comply fully with the requirements of all laws including the *Privacy Act 1988* (Cth) (“**Act**”) and the 13 Australian Privacy Principles set out in the Act.
- 1.2. This Privacy Policy is intended to be a guide for you as a member of the IOPO as to the manner in which the IOPO protects your Personal Information.

2. DEFINITIONS

“**IOPO**” means Institute of Professional Organisers, IOPO Pty Ltd (ACN 618 738 293)

“**Personal Information**” means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

“**Sensitive Information**” means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or criminal record, that is also Personal Information, or health information about an individual.

3. PERSONAL INFORMATION

- 3.1 The IOPO may collect Personal Information directly from you, when you become a member of the IOPO, or write to us, telephone us, email us, visit our internet site, or register on our website.
- 3.2 The Personal Information we may collect can include, but is not limited to:
 - (a) name and contact details;
 - (b) company details;
 - (c) qualifications;
 - (d) job title;
 - (e) location;
 - (f) date of birth;
 - (g) mobile device data, including logs of incoming and outgoing phone calls, address book, calendar appointments, text messages, pictures and videos;
 - (h) location data (such as GPS and network triangulation) and navigation data through your mobile device.

- 3.3 The IOPO will only collect Personal Information by fair and lawful means and not in a way that is unreasonably intrusive. At or before the collection of your Personal Information the IOPO will always take reasonable steps to ensure that you are aware of:
- (a) the identity and contact details of the IOPO;
 - (b) if:
 - (i) the IOPO collects Personal Information from someone other than you; or
 - (ii) you may not be aware that the IOPO has collected Personal Information from you.
 - (c) the purpose or purposes of collection of Personal Information;
 - (d) the main consequences (if any) for you if all or some of the Personal Information is not collected by the IOPO;
 - (e) any law that requires the collection of Personal Information;
 - (f) the organisations (or types of organisations) to which we usually disclose Personal Information;
 - (g) the fact that the Privacy Policy contains information about how you may complain about a breach of the Australian Privacy Principles;
 - (h) the fact that the Privacy Policy contains information about how you are able to gain access to the Personal Information that we hold about you; and
 - (i) whether we are likely to disclose the Personal Information to overseas recipients, and, if so, to which countries.
- 3.4 When it is not practicable to cover all of these disclosure obligations at the time of collection, we will give you the information about these matters as soon as practicable after the collection of your Personal Information. This may be in confirmatory documents.
- 3.5 Wherever practicable we will collect your Personal Information directly from you.
- 3.6 There are instances when we may, subject to law, collect your Personal Information from a third party such as your agent, ASIC, the internet, a credit reporting agency or a credit provider. Where we do not collect your Personal Information directly from you, we will take reasonable steps to ensure that the information collected is:
- (a) relevant for the purpose for which it was collected;
 - (b) accurate, up-to-date and complete;
 - (c) not unreasonably intrusive on you; and also that

(d) we have fulfilled our disclosure obligations to you.

3.7 Any Personal Information that the IOPO holds about you will be kept in secure electronic files.

4. OUR USE AND DISCLOSURE

4.1 Subject to some exceptions, the IOPO will only use your Personal Information for a purpose for which you have expressly or impliedly consented or that is related to the primary purpose of collection and is reasonably expected. This purpose may include, but is not limited to:

- (a) populating and managing the IOPO members directory;
- (b) determining suitability for membership of the IOPO;
- (c) accreditation approval with the IOPO;
- (d) using deidentified information for qualitative and quantitative research;
- (e) preparing agreements in relation to membership;
- (f) financial arrangements relating to membership; and
- (g) purchases made through the IOPO website.

4.2 The IOPO will not use the Personal Information that it collects from you for the purposes of direct marketing.

4.3 Subject to what is permitted by law, the types of third parties we may disclose your Personal Information to include:

- (a) credit reporting agencies;
- (b) our agents, contractors and external advisers whom we engage from time to time to carry out, or advise on, our functions and activities;
- (c) your agents and contractors;
- (d) your executor, administrator, trustee, guardian or legal advisor;
- (e) regulatory bodies, government agencies, law enforcement bodies and courts;
- (f) any person or organisation who introduces you to us, subject to your consent;
- (g) debt collecting agencies;
- (h) your sureties and guarantors and prospective sureties and guarantors; or
- (i) any person, to the extent necessary to carry out any instruction you give to the IOPO.

- 4.4 The IOPO may also need to disclose your Personal Information if:
- (a) it is necessary to lessen or prevent a serious and imminent threat to life, health or safety of an individual or a serious threat to public health or safety;
 - (b) it is unreasonable or impracticable to obtain your consent;
 - (c) the use or disclosure is required or authorised under Australian law or court/tribunal order;
 - (d) The IOPO has reason to suspect that unlawful activity, or misconduct of a serious nature that relates to the IOPO's functions has been, is being or may be engaged in, and uses or discloses the Personal Information as a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities;
 - (e) The IOPO reasonably believes that the collection, use or disclosure is reasonably necessary to assist to locate a person who has been reported missing and the IOPO reasonably believes that the collection, use or disclosure is necessary in order for the IOPO to take appropriate action in relation to the matter;
 - (f) it is for the purpose of a confidential alternative dispute resolution process;
 - (g) it is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim;
 - (h) The IOPO reasonably believes that the use or disclosure is reasonably necessary for one of the following by or on behalf of an enforcement body:
 - (i) the prevention, detection, investigation, prosecution or punishment of criminal offences, or breaches of law imposing a penalty or sanction;
 - (ii) the conduct of protective or custodial activities;
 - (iii) the enforcement of laws relating to the confiscation of the proceeds of crime;
 - (iv) the protection of public revenue;
 - (v) the prevention, detection, investigation or remedying of misconduct of a serious nature or prescribed conduct;
 - (vi) the conduct of surveillance activities, intelligence gathering activities or monitoring activities;
 - (vii) the preparation for, or conduct of, proceedings before any court or tribunal or implementation of the orders of a court or tribunal.
- 4.5 If the IOPO uses or discloses Personal Information to an enforcement body, it will make a note of the use or disclosure.

- 4.6 The IOPO is not likely to disclose your Personal Information to overseas recipients.
- 4.7 The IOPO may, from time to time, use deidentified Personal Information for the purposes of industry research and development.

5. THIRD PARTIES

- 5.1 Our internet site may include links to other websites whose privacy practices may differ from those of the IOPO. When you use a link to go from our internet site to another website, such as that of our payments processors, the privacy policy for the other website is the privacy policy applicable to that website, and our Privacy Policy has no application to that third party website. We encourage you to carefully read and understand the privacy policy of any website you visit.
- 5.2 Our internet site may include social media features, such as the Facebook like button, widgets and the share button. These features may collect your IP address, which page you are visiting, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our internet site. Your interactions with these features are governed by the privacy policy of the company providing it.
- 5.3 Except as otherwise expressly discussed in this Privacy Policy, this document only addresses the use and disclosure of information the IOPO collects from you. To the extent that you disclose your information to other parties, whether they are users on our internet site or other internet sites, different rules may apply to their use or disclosure of the personal information you disclose to them. To the extent that we use third party advertisers, they adhere to their own privacy customs and policies. Since the IOPO does not control the privacy policies of third parties, you are subject to the privacy policies of that third party. We encourage you to ask questions before you disclose your personal information to others.

6. DATA QUALITY

- 6.1 The IOPO will endeavour to make sure that the information we collect, use or disclose is accurate, complete and up-to-date.
- 6.2 The IOPO will endeavour to take such steps (if any) as are reasonable in the circumstances to ensure that the Personal Information that we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant.

7. DATA SECURITY

- 7.1 The IOPO will take reasonable steps to protect the Personal Information it holds from misuse, interference, loss and from unauthorised access, modification or disclosure.
- 7.2 The IOPO will take reasonable steps to destroy or permanently de-identify Personal Information if it is no longer needed for any purpose which the information may be needed or disclosed.

8. ACCESS AND CORRECTION

8.1 Following registration as a user on our website, you can review and change the Personal Information you submitted during registration including:

- (a) your registration information such as: name, company, address, city, state, post code, country, primary phone number, secondary phone number, fax number and gender; and
- (b) your password (if you have supplied such information).

8.2 The IOPO will provide you with access to your Personal Information upon request by you, except to the extent that:

- (a) providing access would pose a serious and imminent threat to the life or health of any individual, or to public health or public safety;
- (b) providing access would have an unreasonable impact upon the privacy of other individuals;
- (c) the request for access is frivolous or vexatious;
- (d) the information relates to existing or anticipated legal proceedings between the IOPO and you, and the information would not be accessible by the process of discovery in those proceedings;
- (e) providing access would reveal the intentions of the IOPO in relation to negotiations with you in such a way as to prejudice those negotiations;
- (f) providing access would be unlawful;
- (g) denying access is required or authorised by or under Australian law or a court/tribunal order;
- (h) both of the following apply:
 - (i) the IOPO has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to its functions or activities has been, is being, or may be engaged in;
 - (ii) giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
- (i) providing access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (j) giving access would reveal evaluative information generated within the IOPO in connection with a commercially sensitive decision-making process.

8.3 Where it is reasonable and practicable to do so, the IOPO will endeavour to provide any access to Personal Information in the manner you have requested (for example, by

email, phone, hard copy or an electronic record).

8.4 If the IOPO charges for providing access to Personal Information, those charges:

- (a) will not be excessive; and
- (b) will not apply to lodging a request for access.

8.5 If the IOPO denies you access to your Personal Information, it will provide you with written notice that sets out:

- (a) the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so;
- (b) the mechanisms available to complain about the refusal; and
- (c) any other matters prescribed by the regulations.

8.6 If the IOPO holds Personal Information about you and either the IOPO is satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out of date, incomplete, irrelevant or misleading, or you request that the IOPO corrects the Personal Information, the IOPO will take reasonable steps to correct the Personal Information.

8.7 If the IOPO does not agree to make changes to your Personal Information:

- (a) the IOPO will provide you with the reasons for its decision, except to the extent that it would be unreasonable to do so;
- (b) the mechanisms available to complain about the refusal;
- (c) any other matter prescribed by the regulations; and
- (d) you may request that a statement of the request for the amendment be associated with your Personal Information and the IOPO will take reasonable steps to associate the statement in such a way that will make the statement apparent to users of the information.

8.8 A circumstance where we may not agree to change your Personal Information is if the information is inaccessible and never likely to be used.

9. IDENTIFIERS

The IOPO will not use tax file numbers, pension numbers, Medicare numbers or any other agency identifiers as an identification record. The IOPO will only request, use and disclose these numbers in the manner and for the purposes authorised by law.

10. ANONYMITY

Wherever it is lawful and practicable, individuals will have the option of not identifying themselves, or using a pseudonym when entering into transactions with the IOPO. However, for most purposes this will be impracticable.

11. COLLECTION OF SENSITIVE INFORMATION

11.1 The IOPO will not collect your Sensitive Information unless:

- (a) you have expressly consented to such collection;
- (b) the information is reasonably necessary for one or more of the IOPO functions or activities;
- (c) the collection is required or authorised by law;
- (d) a permitted general situation exists in relation to the collection of the information by the IOPO; or
- (e) the IOPO is an organisation and a permitted health situation exists in relation to the collection of the information by the entity.

11.2 The IOPO will usually seek to perform its functions and activities in a way that minimises its need to collect Sensitive Information.

12. OPENNESS

12.1 This Privacy Policy is available to anyone who requests it.

12.2 On your request, the IOPO will take reasonable steps to let you know, generally, what sort of Personal Information we hold, for what purposes, and how we collect, hold, use and disclose that information.

13. COMPLAINTS

If at any time you are concerned about the way the IOPO is handling your Personal Information, or if you are concerned that the IOPO has breached any of the Australian Privacy Principles, or any other registered Privacy Code that binds the IOPO, you are able to make a complaint as follows:

- (a) Set out your complaint in writing and forward it to:
The Institute of Professional Organisers
research@iopo.com.au
- (b) The IOPO will consider your complaint and reply within seven (7) days of receipt. If the IOPO considers that there has been a breach it will immediately take steps to rectify the breach, and put measures in place to ensure that it does not happen again.

- (c) If you are not satisfied with the IOPO's response, you are able to make a complaint to the Office of the Australian Information Commissioner in writing or online.

14. CHANGES TO THIS PRIVACY POLICY

The IOPO may update this Privacy Policy from time to time. All changes made to this Privacy Policy will be in compliance with the law. An updated copy of this Privacy Policy will be available to anyone who requests it.