



PRIVACY POLICY

ACSI PRIVACY POLICY

We recognise the importance of privacy protection and are committed to complying with the Australian Privacy Principles contained in the Privacy Act 1988 (the Privacy Act).

1. TYPE OF INFORMATION WE COLLECT

Personal information is information or an opinion that identifies an individual. We collect information such as name, address, telephone and email contacts, gender, employer and position title.

We collect personal information to be able to communicate with and service our members and associates.

We may also gather additional personal information received in relation to our Annual Conference such as:

- dietary requirements detailed on delegate registration forms
- biographies and headshots of speakers
- conference feedback surveys
- photography and audio taken during the conference.

If you provide your information anonymously, it will not be personal information.

We may also collect any other personal information that you submit to us, via our websites, including www.acsi.org.au (Website).

2. HOW WE OBTAIN PERSONAL INFORMATION

The majority of information collected by us is received directly from you by way of:

- our website
- email
- business card
- phone
- meetings, events and conferences run by or in association with us

- event registration forms
- member and delegate surveys.

If we collect your personal information from third parties, it will be in situations where we understand you have provided your consent, or you would reasonably expect that your information would be provided to us.

If someone other than you provides us with personal information about you that we did not ask for, or you provide us with unsolicited personal information, we will only hold, use or disclose this information if we determine that we could have collected this information from you had we asked for it. In this circumstance we will take all reasonable steps to notify you of the collection of that information. If we could not have collected this personal information, we will lawfully de-identify or destroy that personal information.

3. HOW DO WE USE THIS INFORMATION?

This Privacy Policy deals with personal information of Website users, our members, our associates, job applicants, ASX company board directors, event attendees, members of the public, service providers and other third parties.

We will only use your personal information for the purposes for which it was given to us, or for purposes which are directly related to the provision of our services to you, our members or for marketing purposes (refer section 4 below). We may also use your personal information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

We collect, use and exchange your information so that we can:

- administer our products and services, including running events such as our annual conference
- manage our relationships
- update our records and keep your contact details up to date
- contact you and respond to queries
- conduct and improve our business
- identify and tell you about other products or services that we think may be of interest to you.

4. DIRECT MARKETING

We may communicate directly with individuals to promote our goods and services that we believe will be of interest to you. We may also use it for other purposes for which you might reasonably expect us to use that information. You authorise us to use any email address or other contact information you provide to use at any time for such above purposes.

You can opt out of receiving electronic communication at any time. You agree and acknowledge that even if you opt out of receiving information about future events or marketing material, we will still send you essential information that we are required to send you relating to the services we provide.

An opportunity to 'unsubscribe' is provided within any ACSI direct marketing materials when all personal information was not provided directly by the recipients.

5. WHO DO WE EXCHANGE PERSONAL INFORMATION WITH?

We may exchange information with third parties where this is permitted by law or for any of the purposes mentioned in section 3. Third parties may include:

- third party service providers, including commissioned research providers and proxy voting consultants
- digital marketing and other service providers such as social media platforms, including Twitter and LinkedIn
- technology support service providers such as Armada Solutions, Loop Secure, Webplace, Digital Pacific and NOW Digital where applicable to the service provided to you
- government and law enforcement agencies and regulators
- entities established to help identify illegal activities and prevent fraud where authorised by law.

We may also disclose your personal information to anyone authorised by you or to whom you have provided your consent (either expressly or impliedly) or where another permitted general situation applies (as defined in Section 16A of the Privacy Act).

If we go through a business transition, such as a merger, acquisition by another company, or a sale of all or a part of our business assets, your personal information may be among the assets transferred.

We will not disclose information that personally identifies you to any third party other than as set out in this Privacy Policy.

THIRD PARTIES

Armada Solutions is our contracted information technology (IT) service provider. Armada Solutions is subject to the Privacy Act and a copy of its Privacy Policy can be found [here](#).

Loop Secure provides information security services to ACSI. Loop Secure's privacy policy can be found [here](#).

Webplace is our contracted website support provider, and Digital Pacific is responsible for hosting our Website www.acsi.org.au. NOW Digital is the developer of ACSI's online member portal, which will be hosted on the Microsoft Azure platform. Digital Pacific's privacy policy can be found [here](#).

For further information relating to our Website security please refer to section 8 below.

6. SENSITIVE INFORMATION

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

7. HOW WE SECURELY STORE PERSONAL INFORMATION

We take steps to ensure security systems are in place to protect personal information from misuse, interference, and loss and from unauthorised access, modification or disclosure. Personal information is destroyed or de-identified as appropriate, when no longer needed, unless we are required under Australian law or a court or tribunal order to retain it.

We keep hard-copy or electronic records securely stored on our premises and systems or offsite using trusted third parties. We have a workplace data & digital policy which outlines the requirements of staff with respect to information security and cybersecurity. We have firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses accessing our systems. You agree that you will not act in a manner that results in us collecting, using or storing information that is in breach of our obligations at law.

8. WEBSITE

Registration is not required for you to use our Website www.acsi.org.au.

Our Website may from time to time contain links to other websites. ACSI makes no representations or warranties regarding how user data is used on third-party servers. We recommend reviewing the privacy policy of each third-party site linked from the Website to determine their use of your personal data.

ACSI members can access an exclusive member portal called ACSI Delta (www.delta.acsi.org.au). This service is subject to the Terms of Use, available at <https://delta.acsi.org.au/>.

Registration is required to use ACSI Delta. Users are given a username and create their own password.

Only minimal 'personal information' is recorded or stored on ACSI Delta. This includes the user's name, email address, employer, basic details of the usage of ACSI Delta (such as when they last logged in) and watchlists of ASX listed companies and engagement themes entered by users which enable them to access more personalised information.

We occasionally use website analytics to gain a better understanding of the needs and interests of users. The third-party service provider used is Google Analytics and they do not have access to personal information.

ACSI Delta may from time to time contain links to other websites. ACSI makes no representations or warranties regarding how user data is used on third-party servers. We recommend reviewing the privacy policy of each third-party site linked from ACSI Delta to determine their use of your personal data.

9. ACCESSING, UPDATING AND CORRECTING YOUR INFORMATION

We do our best to ensure the personal information kept is accurate, complete and up to date.

Under the Privacy Act, you have a right to seek access to information which we hold about you (although there are some exceptions to this). If you request access to the personal

information, we hold about you we will respond to your request within a reasonable period of time and, where reasonable and practicable, give access to the information in the manner you request. This will be subject to any exemptions provided under the Privacy Act. You may request this information by writing to our Privacy Officer. If you wish to seek access to the personal information that we hold about you, please forward your request to our Privacy Officer (details found below in section 10).

You also have the right to ask us to correct information about you, which is inaccurate, incomplete or out of date. If you believe that any of your personal information is inaccurate, please contact us using the below details and we will take reasonable steps to correct it.

10. MAKING A PRIVACY COMPLAINT

Please contact us if you wish to discuss any issues relating to our Privacy Policy.

This may include accessing, updating and correcting your information or making a complaint if you believe we have breached your privacy rights.

If you wish to make a complaint about a breach of the Privacy Act by us, you may do so using the contact details listed below. We will seek to respond to any complaint within a reasonable period of time. We may seek further information from you in order to provide a comprehensive and complete response.

Enquiries and complaints can be directed to:

The Privacy Officer

📞 +61 38677 3890

✉ info@acsi.org.au

📍 Level 23, 150 Lonsdale Street, Melbourne VIC 3000

If you do not receive a response from us within 30 days or are otherwise unsatisfied with our response, you may also make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details can be found at <https://www.oaic.gov.au/about-us/contact-us>.

11. ANONYMITY AND PSEUDONYMITY

Where it is practical to do so, when contacting us, you have the option to either not identify yourself or to use a pseudonym. However, this will not apply if we are required or authorised under Australian law (or a court or tribunal order) to only deal with individuals who have identified themselves.

If you wish to make a complaint without identifying yourself, you can make an anonymous complaint or by using a pseudonym in writing or by phone via the contact details provided above.

12. CHANGES TO THE PRIVACY POLICY

We will update this Privacy Policy when our information handling practices change. Updates will be publicised on our Website and as otherwise as appropriate to the particular update.