

Privacy Policy

Introduction

The Royal Australian Chemical Institute Inc. (RACI) is committed to responsible privacy practices and complying with the Privacy Act 1988 (Cth) (Privacy Act) including any amendments.

Personal privacy is very important to the RACI and the RACI endeavours to ensure our stakeholders are always in control of what is done with their personal data.

Transmission of data online is not 100% secure and the RACI cannot guarantee the security of data sent in this way. Transmission of data over the internet is at the sender's risk.

This policy sets out how RACI complies with its obligations under the Privacy Act and how it collects, uses, stores, protects, manages, and discloses personal information, which includes sensitive information (as defined under the Privacy Act).

Third party websites and services linked to through the RACI websites have their own privacy policies, independent of the RACI. We hold no responsibility or liability for those policies and encourage you to review the privacy policies of any third-party website you visit.

From time to time RACI may alter this policy at its discretion, and in accordance with any changes to legislation and regulations and the RACI will ensure that the latest version of this policy is available from the website at www.raci.org.au. It is also available by contacting the RACI Office.

This Privacy Policy is RACI's overarching policy on handling personal information. The Cyber Security Policy and Data Retention & Destruction Policy implement this Policy. In the event of inconsistency, this Privacy Policy prevails to the extent of any conflict, subject to applicable law.

Objective

This Policy is to establish protocols and protections to ensure that those providing personal information for the purposes of furthering the interests of RACI can do so with confidence and assurance that all information, including personal, will be satisfactorily handled.

Scope

This Policy encompasses all aspects of the business of RACI and the provision and creation of information by its Members for the purpose of RACI business.

This Policy is applicable to RACI staff, RACI Members and their personnel, partners, stakeholders and those people who access RACI information and services or otherwise provide personal information to RACI.

1. Types of information collected by RACI

Personal information is collected to provide a better experience for users of the RACI websites and applications, amongst other reasons. RACI will only collect personal information where it is reasonably necessary for the performance of its functions or activities. The personal information RACI collects may include the following:

1.1. *Membership Information*

this includes information provided to RACI while submitting an application to become a member. This information will be used by RACI's staff and administrative team for the purpose of assessing the individual's application. Such information includes name, postal address, telephone number, fax number, e-mail address, scholastic achievements and curriculum vitae's (CV's), subscriber name or screen name, password used to access services, country of residence and/or method of payment

1.2. *Event information*

this includes information provided to RACI while registering to attend an event, or while attending an event held by RACI. Events include webinars. Information will generally include name, postal address, telephone number, fax number. Managers, Team Leaders & Coordinators

1.3. *Registration Information*

this includes information that RACI collects when an individual register to use the RACI website or otherwise registers to access services on the website. The information RACI collects includes the individual's name and email address and other contact details and any other information the individual directly gives RACI at the registration stage.

1.4. *User information*

this includes information that the individual has provided to RACI when using the services and information RACI collects from submissions on the website. The information RACI collects includes form submissions and any other additional information the individual provides to RACI directly or indirectly through their use of the website (including data relating to place of employment and affiliations). RACI uses such information to assist in

providing the services to the individual and will not use this information for any other purpose.

1.5. Subscription information

this includes any information the individual chooses to provide to RACI such as personal and contact details when subscribing to receive marketing information or other newsletters (for example name, role and email address) and includes information regarding any subscriptions.

1.6. Financial information

this includes information such as payment card details and bank account details. RACI uses this information to send to third party payment gateways.

1.7. Website use information

When an individual uses the RACI website, for example when they contact RACI, RACI will collect information that enables the website to be able to run. RACI also collects information provided when reporting a problem with the RACI website or service.

1.8. Surveys

information in connection with client surveys, questionnaires and promotions.

1.9. Other information we collect related to your use of the Website

this includes an individual's device identity and type, I.P. address, home server, domain names, geo-location information, page view statistics, advertising data and standard web log information and any other information provided by the individual to RACI via its website or online presence, or otherwise required by RACI.

1.10. Social media

information from social media activity (such as likes, shares and tweets) when users interact with the RACI on social media.

1.11. Children's Information

RACI minimises collection of children's personal information and retains it only as long as necessary for program administration, safety, or legal requirements. Unless a longer period is required by law, RACI will de-identify or delete children's program data as soon as practicable after program completion and, in any event, in accordance with the Data Retention & Destruction Policy.

RACI will generally not be required to collect sensitive information about an individual. RACI will only do so if it is considered reasonably necessary for RACI to collect such information for RACI to perform its functions or activities and the individual consents, or collection is required by law or another exception under the Privacy Act applies.

2. Collection Methods

2.1. Directly from an individual: RACI collects most of the personal information it requires directly from the relevant individual by way of forms voluntarily completed online by an individual. RACI may also collect personal information:

- via post
- telephone
- face to face
- written correspondence
- collected as a business contact

Where it may be unreasonable or impracticable to do so, RACI may also collect personal information about an individual from other sources and/or third parties.

2.2. From third parties: From time to time, RACI may also collect information from third parties, such as from an individual's employer or nominating organisations (such as for conference or event attendance or committee members).

From time to time RACI may collect or receive personal information from third parties, such as joint venture partners, contractors, mailing operations so that it can conduct its business, including but not limited to conducting conferences and events.

When RACI receives unsolicited information from third parties it will check that the information is reasonably necessary for RACI business, activities and operations. If it is, that information will be handled in accordance with this policy and RACI will take reasonable steps to contact the individual to obtain consent to hold the information, or destroy or de-identify the information in accordance with the Privacy Act.

Where permitted by the Privacy Act, RACI may also collect and use an individual's personal details in other ways as permitted by relevant laws, such as through prominent publication of an individual's contact details on a publicly available website.

2.3. From an individual's use of RACI services: RACI may collect a variety of information from an individual's interaction with the website and RACI online services including the individual's IP Address; the date, time and duration of their visit; the number of pages downloaded; and the type of browser they use (please see above). Please review the RACI cookie policy below.

RACI may also collect an individual's personal information online via various application platforms and databases that the RACI use which are either wholly owned or used under license.

RACI may also collect aggregated data. This information is generated by RACI systems as they track information about the individual's use of the Website. This information does not identify the individual personally and is not linked to the personally identifiable information that the individual may have provided.

- 2.4. Social media and cookies: RACI may also collect personal information from an individual when they use or access RACI social media pages.

3. Use and disclosure of personal information

3.1. RACI collects personal information to:

- provide products and/or services to an individual;
- receive products and/or services from a company or individual;
- contact an individual;
- consider employment applications and manage employee relations;
- respond to concerns, complaints or issues raised by an individual to or about RACI;
- facilitate the conduct of business transactions and operations between RACI and an individual and/or third parties;
- allow RACI to conduct its business, activities and operations;
- to provide information to RACI Members;
- to provide information to contractors, and other service providers engaged by RACI to deliver or provide goods and services or to otherwise act on behalf of RACI.
- for record keeping and administrative purposes.
- to improve and optimise service offerings and customer experience and market research.
- to comply with legal obligations, resolve disputes or enforce agreements with third parties.
- to administer and protect our services;
- to enable the individual to take part in a competition
- provide newsletters, updates or subscription services to individuals based on:
 - RACI activities;
 - access to research;
 - business operations;
 - conferences and events;
 - participation in forums and collaborative projects;

- participation in groups and committees;
 - training resources;
 - commercial benefits;
 - programs;
 - ensure that RACI's website remains relevant to individuals;
 - provide information based on an individual's area of interest.
- 3.2. RACI will only use or disclose information for the primary purpose for which it was collected, including such information set out above in clause 3.1, except where RACI has obtained the individual's consent to do so, or another exception applies under the Privacy Act. In the event that RACI holds sensitive information about an individual, RACI will only disclose or use that information with the individual's consent or if the use or disclosure is directly related to the primary purpose (or another exception applies under the Privacy Act).
- 3.3. RACI will also use or disclose an individual's personal information or sensitive information if RACI is required to do so by law or a court / tribunal order, or if RACI reasonably believes that the use or disclosure of the information is reasonably necessary for an enforcement related activity or on behalf of an enforcement body, in which case RACI will make a written note of the use or disclosure or another exception applies under the Privacy Act.
- 3.4. RACI will act in accordance with any terms and conditions that an individual agrees to when they provide RACI with their personal information (for example when entering a competition or complete a survey conducted by RACI).
- 3.5. RACI may disclose with the individual's consent, personal information such as contact details for those persons who participate in group activities or research, or belong to a special interest group on the RACI website.
- 3.6. Occasionally RACI may use and disclose personal information for the purpose of direct marketing to an individual where it is permitted by law or an individual has given their consent.
- 3.7. Direct marketing involves communicating directly with an individual to promote products, services, conferences and events from RACI or RACI contractors, event exhibitors, sponsors or partners. RACI may employ a range of delivery methods – such as SMS, email, mail or telephone. Any individual can unsubscribe from RACI direct marketing or change their contact preferences by notifying RACI.
- 3.8. An individual also has the option of not identifying themselves to RACI or by using a pseudonym. However, withholding personal information, or using a pseudonym or remaining anonymous may result in RACI not being able to

provide the individual with requested products or services and it may mean that an individual cannot participate in some RACI activities.

- 3.9. However, RACI reserves the right under the APPs to seek the identity of an individual if it is in accordance with the law or a determination of a court or if it is impractical for RACI to provide services to or deal with the individuals.

4. To whom does RACI disclose personal information

- 4.1. RACI may disclose personal information to third parties in accordance with this policy and the Privacy Act in connection with the purposes described above.

- 4.2. This may include disclosing an individual's personal information to the following types of third parties, including but not limited to:

- RACI staff – to provide you with applicable services.
- Banks, finance management, direct debit, and accountancy software systems – to enable RACI to process payments for you in accordance with the appropriate transaction that you are entering into with us.
- Reviewers and judges – in relation to an application for an award, scholarship, bursary, or grant funding.
- Mentoring services – to provide you with the service you have opted for.
- Telemarketing agencies – in order that they may assist us with our membership renewal process.
- Mailing and delivery companies – to send you written communication and hard copies of newsletters, magazines etc. as appropriate.
- Electoral service companies – for assisting us with the running of our elections process.
- Sponsors and external judges – for their assessment of participants in our events and competitions.
- Third party legal, counselling and career services – to provide the contracted service (only on receipt of your completed contact form).
- Social media – where you have submitted a community related news story to us and we have published it, publication may be via our website and in the print version of choice.
- Print supplier companies – for fulfilment of external printing.
- Travel booking systems, travel companies, taxi services and flight providers – where you request, we make such arrangements on your behalf.
- Venues where we are running an event, conference or symposium – when the venue requires personal details of attendees to make bookings, for example for hotel rooms.

- Publishing software and solutions companies – your personal data may be processed in such software systems in order for us to generate royalty details.
 - Book sales agents, book distributors, shipping agents – in order to fulfil our sales obligations to you.
 - Third parties that require the information for law enforcement or to prevent a serious threat to life, health or safety of an individual or the public; and as otherwise permitted by law.
- 4.3. RACI may also disclose personal information to other third parties, where RACI believes in good faith that RACI is required to do so by law, or an exception applies under the Privacy Act or with the individual’s consent.
- 4.4. Where RACI discloses personal information to third parties it will use reasonable efforts to ensure that such third parties only use the personal information as reasonably required for the purpose it was disclosed to them and in a manner consistent with this policy and the APPs under the Privacy Act. RACI’s efforts will include, but not be limited to, suitable privacy and confidentiality clauses in agreements with third parties to whom RACI discloses personal information.
- 4.5. RACI does not sell or license an individual’s personal information to third parties.

5. RACI and employee personal and/or sensitive information

- 5.1. RACI is responsible for the safe keeping and maintenance of personal and/or sensitive information relating to its employees and prospective employees, including but not limited to:
- emergency contact information;
 - banking information necessary to pay salary and wages;
 - superannuation details for contributions;
 - medical certificates and health details;
 - taxation details;
 - financial details and other personal interests (for the purposes of managing conflict of interests)
 - academic results, training and development; and
 - employee’s performance information.
- 5.2. RACI generally collects personal and/or sensitive information directly from an employee or applicant and receives consent for the collection of that information.
- 5.3. However, RACI may also collect personal and/or sensitive information from managers, other employees or intermediaries such as recruitment agents and personnel providers.

- 5.4. RACI may also collect personal information about employees or prospective employees from third parties, such as previous employers and referees.
- 5.5. It is only in rare cases that RACI may collect sensitive information without an employee's consent – such as where it is necessary to investigate suspected unlawful activity or misconduct of a serious nature within RACI.

6. RACI and purchases

For individuals and agencies who purchase products or services from RACI, all personal information or credit information gathered from the purchasing of products or services is collected, held and disposed of in accordance with this policy and the Privacy Act.

7. Storage and security of personal information

- 7.1. RACI will take all reasonable steps to ensure the security both in hard copy and electronically of the personal information it collects and holds. This involves protecting the personal information from misuse, loss, unauthorised modification and disclosure.
- 7.2. All of RACI's staff are bound by a confidentiality agreement which forms part of RACI's employment procedures and is consistent with this policy.
- 7.3. The electronic databases that hold information, as well as RACI's internal hard copy systems seek to protect the security of personal information.
- 7.4. Some of RACI's website and email systems are cloud based services and therefore may be based outside Australia, however RACI will only transfer personal information outside of Australia in accordance with the APPs including:
 - with the individual's consent (this is deemed to have been given through the entering of information of the RACI's website or through the use of RACI's email addresses);
 - Where RACI is under a contractual obligation (with the individual or another party) to do so, or there is some other benefit to the individual; or
 - Where RACI is satisfied that the recipient of the information will uphold principles for the fair handling of personal information and will not deal with the personal information in a manner inconsistent with the APPs and this Privacy Policy.
- 7.5. When the personal information is no longer required, legally or otherwise, the RACI will take reasonable steps to destroy or permanently de-identify the personal information.
- 7.6. RACI takes reasonable steps to destroy or de-identify personal information when it is no longer required for any purpose permitted by the Privacy Act and is not otherwise required to be retained by law or for legitimate business purposes (for example, tax, employment, or recordkeeping obligations).

Where immediate destruction is not practicable, RACI may place information “beyond use” (i.e., not access, use, or disclose it; apply access controls; and commit to destroy it when practicable), consistent with OAIC guidance. See RACI’s Data Retention & Destruction Policy for operational details.

8. Accuracy of and access to personal information

- 8.1. RACI takes all reasonable steps to ensure that the personal information RACI collects about an individual is accurate, up to date and complete. Where RACI collects that information from an individual directly, RACI relies on the individual to supply accurate information. RACI makes it easy for individuals to keep their personal information accurate, complete, and up to date. Where RACI uses or discloses personal information RACI will also ensure that that personal information is relevant.
- 8.2. Subject to the Privacy Act, individuals have a right to access and correct any personal information about them that RACI may hold. If an individual wishes to request access to the personal information RACI holds about them, the individual should use the contact details set out below including your name and contact details. RACI may need to verify the individual’s identity before providing them with their personal information. In some cases, RACI may be unable to provide individuals with access to all their personal information and where this occurs, RACI will explain why. RACI will deal with all requests for access to personal information within a reasonable timeframe.
- 8.3. If an individual thinks that any personal information RACI holds about them is inaccurate, they should contact RACI using the contact details set out below and RACI will take reasonable steps to ensure that it is corrected.
- 8.4. If RACI receives a request from an individual to access or correct personal information RACI will respond to that request within a reasonable time and in the manner requested by the individual, if it is reasonable and practicable for RACI to do so. RACI may charge a reasonable fee for giving access to the information.

9. Use of Cookies on RACI Website

- 9.1. The RACI's website allows anonymous browsing and does not require a user to identify themselves unless they wish to register for a service.
- 9.2. When using the RACI website or through social media RACI may collect web site usage information such as the IP address an individual is using, the name of their internet service provider, their browser version, cookies, the pages of the RACI website that were requested, the date and time of those requests and the country the individual is in. Except where provided to RACI on the website RACI does not collect personal information such as name, mailing address,

email address or phone numbers when an individual is browsing the RACI website.

- 9.3. RACI will use information from its website to create aggregate statistics about usage and other related site information that does not personally identify users.
- 9.4. If an individual posts information to certain public parts of the RACI website or to any social media pages operated by RACI, the individual must acknowledge and accept that the information will be publicly available.

10. Data breach

- 10.1. In the event of RACI being advised of a data breach, RACI will not disclose the identity or personal information of that person, unless the individual agrees, or would reasonably expect RACI to disclose.
- 10.2. If RACI becomes aware of a data breach or suspected data breach RACI will thoroughly investigate the incident and rectify any short comings.
- 10.3. Suspected personal information breaches are managed under RACI's Data Breach Response Procedure, which includes prompt containment, assessment by the CEO/Privacy Officer, and notification to affected individuals and the OAIC where required by the Notifiable Data Breaches scheme.

11. Direct Marketing

- 11.1. RACI will only use any personal information RACI holds on an individual for the purpose of direct marketing if:
 - a) RACI collected the information involved; and
 - b) RACI believes that the individual would reasonably expect RACI to use or disclose the information for direct marketing; and
 - c) RACI provides an option for the individual to request that RACI not use the information for direct marketing – and the individual has not utilised this offer.
- 11.2. If RACI collects the information (that is not sensitive information) from an individual and the individual would not reasonably expect RACI to use or disclose the information for the purpose of direct marketing, or RACI collected the information from someone other than the individual, RACI will only use or disclose the information with the individual's consent or where it is impracticable to obtain that individual's consent. Either way, RACI will provide the individual with a simple means by which they may request not to receive direct marketing communications from RACI.
- 11.3. RACI maintains marketing contact and preference data only for as long as necessary to provide requested updates and to honour opt-out requests. RACI retains suppression list entries (minimal data) solely to ensure no further

marketing is sent. See the Data Retention & Destruction Policy for retention periods.

12. If RACI can't collect an individual's personal information

12.1. If an individual does not provide RACI with their personal information described above, some or all of the following may happen:

- RACI may not be able to provide the individual with access to services or data within the RACI websites and applications, either to the same standard or at all;
- RACI may not be able to provide the individual with information about the services that you may want; or
- RACI may be unable to tailor the content of the website or the services to the individual's preferences and the individual's experience of RACI services may not be as enjoyable or useful.

13. Contact

13.1. Any individual with questions, corrections to personal information, concerns or complaints about this Policy or its application can contact:

RACI Member Services

Address: PO Box 398, Somerton VIC 3062

Telephone: 03 9328 2033

Email: member@raci.org.au

13.2. RACI takes all matters regarding privacy seriously and will assess all questions, corrections, concerns or complaints accordingly. RACI aims to resolve any issues in a timely and efficient manner and will as required by the Privacy Act give reasons for its decisions under this policy.

13.3. If an individual is not satisfied with the outcome of RACI's assessment or their queries, concern or complaint, RACI will advise them to contact the Office of the Australian Information Commissioner:

Office of the Australian information Commission

Office Address: Level 3, 175 Pitt Street, Sydney NSW 2000

Postal Address: GPO Box 5218, Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

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Responsible Person	CEO
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