

IFACCA PRIVACY POLICY: 19 DECEMBER 2017

The **International Federation of Arts Council and Culture Agencies** and its secretariat (International Arts Federation Services Pty Ltd ABN 19 096 797 330) based in Sydney, Australia (together, **IFACCA**) are committed to protecting and respecting your privacy, and take their obligations under the *Privacy Act 1988* (Cth) very seriously.

As a result, IFACCA has implemented practices, procedures and systems to comply with all legal obligations and, in particular, to:

- maintain the confidentiality and security of personal information it collects and holds; and
- manage its systems, practices and procedures in an open and transparent way.

By “personal information”, we mean information or an opinion about an identified individual or about an individual who is reasonably identifiable from the information.

This Policy sets out how we handle personal information we collect and hold.

1. What personal information does IFACCA collect and hold?

The kinds of personal information we may collect and hold are:

- contact details (including email addresses);
- names;
- gender;
- language preferences;
- age-range;
- personal information in answers to security log-in questions and survey questions; and
- details of your visits to our site (including traffic and location information, which pages you visit, weblogs and other communication information, the previous page visited and the type of browser you are using).

For staff of member organisations, we may collect and hold the following personal information:

- the organisation for which you work;
- your expertise (as stated to us by you);
- your research and news interests (as nominated by you);
- the information in your “bio”;
- your social media handles (if you choose to share these with us).

Also, when you visit our site, we may collect information about your computer (including your IP address, operating system and browser type) and the date and time of your visit.

We do not keep all of the above information for all people who contact us, or with whom we deal. In many cases, we may have only one or two pieces of data relating to any particular person.

2. Why does IFACCA collect and hold personal information?

We collect and hold personal information for a variety of purposes – and different kinds of personal information are used for different purposes.

In each case, however, the personal information we collect and hold is reasonably necessary for our functions and activities, including to provide you with services you would expect from us. These purposes are:

- to provide you with news and information, products or services that you request from us or which we believe may interest you;

- for purposes necessary or incidental to providing you with products and services that you have ordered or requested from us;
- to personalise and customise your experience when using our site (including so that our site is presented in the most effective manner for you and for your computer);
- to communicate with you (including by email, mail or telephone, and including in relation to changes to our products and services);
- to manage and enhance our products and services;
- for system administration;
- for network analysis and security;
- to allow you to participate in interactive features of our site that may be available;
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are, have been or may be engaged in any unlawful activity; and
- as required or permitted by any law (including privacy legislation).

Sometimes, when collecting information from you, we may also ask you to “opt-in” to consent to us using or disclosing your personal information other than in accordance with this Privacy Policy or any applicable law. As part of our commitment to protecting your privacy, however, you will also be given the opportunity to “opt out” from receiving communications from us or from third parties that send communications to you in accordance with this Policy or in accordance with any additional consent you give, and we will comply with your decision. (You will be able to “opt out”, for example, by clicking on an “unsubscribe” link at the end of an email, or by contacting our Privacy Officer.)

3. How does IFACCA get the personal information it collects and holds?

IFACCA only collects personal information by fair and lawful means, including when people:

- are appointed a representative of an IFACCA member organisation;
- order or download files or other materials from us;
- respond to surveys;
- fill in forms on our site (such as contact, registration and order forms or when you subscribe, for example, to our e-newsletter);
- browse our site (we use cookies to ensure you have the best experience when browsing);
- post material to our site or to social media that we may from time to time use (such as Facebook and Twitter);
- contact us for assistance or with questions, or report problems with our site or with a product; and
- contact us directly, other than through our site or social media (for example, by email).

We prefer to obtain any personal information we collect directly from you. In some cases, however, it may be unreasonable or impracticable to obtain personal information directly, and we may obtain that information from someone else, including from member organisations or project partners delivering services to IFACCA.

If you are concerned about what personal information we may hold about you, please see below for information on how you can access and (if necessary) correct that information.

4. Cookies

Cookies are small pieces of data that websites store on your computer. These are used by many sites and for a range of purposes. Depending on how you have configured your browser, you probably already have a great many already stored on your hard drive.

Cookies are required to be able fully to use this website, as we use a cookie to track whether you are logged in and to store your log-in details. These are then used to enhance your experience of the site.

5. Can I interact with IFACCA anonymously or under a pseudonym?

In many cases, you will need to provide your real name when interacting with us. This will particularly be the case when you are contacting us as a representative of a member organisation.

You may however – wherever lawful and practicable – use a pseudonym (or simply not identify yourself) when dealing with us. For example, if you have a complaint or concern about our site, or a general question about us, you are welcome to contact us without identifying yourself. In some cases, however, if you do not provide us with information, we may not be able to provide you with services, or respond adequately to you.

For clarification on when you must identify yourself, please contact our Privacy Officer. (You may use a pseudonym – or simply not identify yourself – when making such an enquiry.)

6. Who has access to my personal information?

Generally, only our staff will access your personal information, and then only on a “need to know” basis.

We may, however, also disclose your personal information:

- to people who work for or with us or for suppliers, who may be engaged in, among other things, processing member organisation payments, research and providing support services;
- to enforce or apply our terms of use or where you have otherwise been engaged in (or threatened) any unlawful activity, and we reasonably believe that disclosure is necessary to the police, any relevant authority or enforcement body, your internet service provider, your employer or supervisor or network administrator;
- to protect the rights, property, health or safety of IFACCA or its staff, customers or others (including exchanging information with other companies and organisations to protect against fraud and to reduce credit risk);
- to our agents, affiliates, joint venture entities and other partners (including members of IFACCA);
- to anyone else that you specifically authorise us to receive information held by us; and/or
- as otherwise required or permitted by law (including under privacy legislation).

While we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the privacy policy of any other web site to which you provide personal information.

7. How can I access (and, if necessary, correct) personal information that IFACCA collects and holds about me?

If you want to review (and, if necessary, correct) personal information that IFACCA may have collected and holds on you, please contact our Privacy Officer.

We will respond to your requests to access and to correct your personal information as soon as possible (but in any case within a reasonable period).

8. How can I complain about IFACCA if it breaches any applicable privacy principles or any registered code that binds it?

Contact our Privacy Officer if you have any complaints about breaches by IFACCA of any applicable privacy principles or of any registered code that binds it.

9. How will IFACCA deal with complaints I might have about breaches of applicable privacy legislation or any relevant registered code?

We will treat any complaint about a breach of privacy legislation or any relevant registered code seriously, and will investigate any breach of which we become aware – including how it occurred and how best to prevent such a breach occurring again.

10. What steps does IFACCA take to secure personal information?

We take all reasonable steps to ensure that your personal information is treated securely and in accordance with this Policy and is not subject to misuse, interference or loss, or unauthorised access, modification or disclosure. For example, apart from using secure servers (with application level security and restricted logins), we implement firewalls, we use “https” for requests to the site, back-ups are stored on secure servers and transferred via SSL encryption.

Please note, however, that the transmission of information (including over the Internet) is never completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information – particularly while it is being transmitted to us – so any transmission is at your own risk and we cannot accept responsibility for misuse or loss of, or unauthorised access to, your personal information where the security of information is not within our control.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

If we have given you (or where you have chosen) a password which enables you to access our services or parts of our site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

11. Does IFACCA disclose personal information to people or organisations outside Australia?

IFACCA holds personal information securely on servers located in Australia.

We will not transfer your personal information overseas to a country that is not subject to a comparable privacy scheme or to an organisation that does not implement privacy obligations at least comparable to the obligations that apply in Australia.

12. Does IFACCA ever change its Privacy Policy?

We will review our Privacy Policy from time to time, to ensure it is in line with best practice and up-to-date with any legislative changes. Any changes to our privacy policy will be incorporated into a new version and made available online. Our use of your personal information will be governed by our most recent policy.

Please contact our Privacy Officer if you have any questions, comments or requests in relation to this Privacy Policy.

13. Who do I contact at IFACCA about privacy issues?

Contact our Privacy Officer by email to info@ifacca.org. If you have any concerns about privacy issues, including in relation to how IFACCA is dealing with your personal information or how it is being held.

Please also contact our Privacy Officer if you want to review and/or correct any personal information we hold about you, or if you receive communications purporting to be connected with IFACCA or our services that you believe have been sent other than in accordance with this Policy or in breach of any law.

IFACCA, we, us and our means the International Federation of Arts Councils and Culture Agencies and its secretariat (International Arts Federation Services Pty Ltd ABN 19 096 797 330), together with their successors and assigns.