

AUSTRALIAN SEED FEDERATION LIMITED

# Privacy Policy

# Australian Seed Federation Limited Privacy Policy

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## 1 ABOUT THIS POLICY

This section explains how to read this policy and describes its purpose.

The Australian Seed Federation may review, vary or replace this Privacy Policy from time to time at its discretion.

### 1.1 Interpretation of this document and general overview

Defining specific terms:

1.1.1 “**APPs**” refer to the Australian Privacy Principles in the Privacy Act.

1.1.2 “**Authorised Person**” means:

- (a) an employee of the Australian Seed Federation; or
- (b) a financial or other adviser of the Australian Seed Federation or an employee or officer of such a person,

to which the Australian Seed Federation discloses Confidential Information.

1.1.3 “**Australian Seed Federation**” refers to the organisation limited by the guarantee with ABN 66 003 160 638.

1.1.4 “**Confidential Information**” means:

- (a) information of the Member relating to its business and business processes, including financial information, average annual turnover, number of employees and all associated information;
- (b) all copies of any information referred to in clause (a) (including anything composed and stored digitally whether or not it has ever been committed to paper),

however Confidential Information does not include any information which:

- (a) is already in the public domain at the time this Deed is executed or which subsequently falls into the public domain lawfully; or
- (b) is obtained by the Australian Seed Federation lawfully and without breaching an obligation of confidence from a source other than the Member.

1.1.5 “**Members**” means the persons or bodies who are recognised as financial members of the Australian Seed Federation on the Federation’s membership database.

1.1.6 “**Personal Data**” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- 1.1.7 “**Personal Information**” has the meaning provided under the Privacy Act and includes information that is capable of identifying an individual such as name, address and date of birth, information of the Member relating to its business and business processes, including financial information, average annual turnover, number of employees and all associated information.
- 1.1.8 “**Privacy Act**” means the *Privacy Act 1988* (Cth) as amended from time to time.
- 1.1.9 “**Privacy Information**” includes Personal Data, Personal Information and Sensitive Information.
- 1.1.10 “**Privacy Policy**” means this privacy policy, as reviewed, varied or amended from time to time.
- 1.1.11 “**Sensitive Information**” includes information relating to religion, racial or ethnic origin.
- 1.1.12 “**We**”, “**us**” and “**our**” refer to Australian Seed Federation.

## 1.2 Purpose of this policy

The Australian Seed Federation is subject to the APPs as laid out in the Privacy Act.

The Australian Seed Federation Privacy Policy explains how our organisation protects your Privacy Information. Along with our Collection Statement our Privacy Policy lays down the principles by which we collect, store, use and disclose any Personal Information you provide to us or we collect from other sources.

Our Privacy Policy also informs stakeholders and anyone else whose Privacy Information is protected in dealing with the Australian Seed Federation, about how they can access their Privacy Information, correct Privacy Information held by us, lodge complaints or make any related enquiry.

## 2 DEALING WITH THE COMPANY ANONYMOUSLY AND PSEUDONYMOUSLY

In accordance with the APPs, individuals have the option of not identifying themselves at all or of using a pseudonym when dealing with the Australian Seed Federation in relation to a particular matter.

However, this option will not apply if:

- the Australian Seed Federation is required or authorised by or under an Australian law, or a court or tribunal order, to deal with individuals who have identified themselves concerning that matter; or
- it is impracticable for the Australian Seed Federation to deal with individuals who have not identified themselves or who have used a pseudonym on a particular matter.

## 3 TYPE OF INFORMATION WE COLLECT AND HOLD

Australian Seed Federation collects information about you for our primary purpose which is to represent its Members at the local, state, national, and international level as well as striving to deliver sustainability, leadership, integrity and collaboration on key issues including climate change world food security, technological developments, trade, and the growth in productivity of Australian and international agriculture, through the delivery and supply of new and improved commodities and services to the market.

Types of Personal Information we collect:

### 3.1 **Website visitors**

For our website visitors, we may collect information such as your IP address, internet service provider, the web page directing you to our website and your activity on our website. This information is usually anonymous and we do not use it to identify individuals. However, due to the nature of internet protocols, such information might contain details that identify you. We collect this information to assist us to make improvements to the content and structure of our website.

### 3.2 **Members**

We collect Personal Information regarding Australian Seed Federation Members. The details are needed so that we can send notices of general meetings so Members can exercise their rights.

The type of information collected can include:

- 3.2.1 name of Members or representatives of Members;
- 3.2.2 contact details (address, phone, email);
- 3.2.3 proxy, attorney or representative appointments;
- 3.2.4 class of Member;
- 3.2.5 date membership commenced; and
- 3.2.6 date membership ceased (for past Members).

### 3.3 **Prospective employees**

We collect Personal Information regarding prospective employees, regarding their skills, interests, qualifications and experience to:

- 3.3.1 assess their suitability for potential employment, with us; and
- 3.3.2 match them to suitable projects or roles.

### 3.4 **Others**

We may collect Personal Information related to the general public.

We collect the Personal Information of directors, employees and others in connection with our corporate and other administrative functions. The type of information collected can include:

- 3.4.1 name and former names;
- 3.4.2 contact details (address, phone, email, assistant details); and
- 3.4.3 date and place of birth.

Types of Confidential Information we collect:

### 3.5 **Members**

We collect Confidential Information regarding Members business and business processes, including financial information, average annual turnover, number of employees and

associated information. We collect this information to allow us to determine the appropriate subscription level and fees for each member.

### **3.6 Financial information**

If you choose to pay for a service or product using the secure credit card payment facility available you will be asked to provide your credit card details, your name, a billing address and your email address. These details are required so that we can process your invoice payment.

The ASF does not store credit card details for payments made via a secure credit card payment facility. All transactional data is stored on a secure site hosted by a contracted service provider, Southern Payment Systems (Pin Payments). As a Level 1 Service Provider, their software, systems and procedures have been assessed and certified to the highest level of compliance provided by the PCI Data Security Standards.

Credit card information is encrypted and stored in a system completely isolated from Pin Payments. At no time is unencrypted card data stored on disk either inside Pin Payments' system or in the card storage system. Internally card information is referenced only through the use of a token. The token is not derived from card information in any way.

All requests to the Pin Payments website and API are forced to use HTTPS to ensure encrypted communications.

## **4 HOW WE COLLECT YOUR INFORMATION**

We may collect Personal Information (not including Sensitive Information) from people through our marketing, business development, operational, human resources, research or other activities.

We have a general policy to collect Personal Information directly from you, unless it is unreasonable or impracticable to do so.

We will need your written consent to collect Sensitive Information about you.

### **4.1 Website visitors**

We collect data from our website using various technologies, including cookies. A cookie is a text file that our website sends to your browser which is stored on your computer as a tag identifying your computer to us. You can set your browser to disable cookies. However, some parts of our website may not function properly (or at all) if cookies are disabled.

### **4.2 Members**

We collect Member Personal Information and Confidential Information directly from the Member.

If you are a proxy or a representative from an Australian Seed Federation Member, we collect your details from you or the appointing Australian Seed Federation Member.

### **4.3 Prospective employees, directors, policy council members and working group members**

We generally collect Personal Information directly from the prospective candidate, directors, policy council members and working group members but may also do so from recruitment agents, recruiters, referrers, referees, Australian Seed Federation officers/employees or other knowledgeable parties where relevant to the recruitment process.

#### 4.4 **Others**

We collect information about others directly from those persons.

In some cases, we collect information about such persons:

- 4.4.1 through forms, agreements, general inquiries;
- 4.4.2 from contractors engaged by Australian Seed Federation; and
- 4.4.3 public sources.

### 5 **PURPOSE FOR WHICH WE COLLECT AND DEAL WITH YOUR INFORMATION**

As a general principle, we only use Privacy Information for the primary purpose for which we collect the information or a secondary purpose related to the primary purpose for which you would reasonably expect us to use the collected information. All the information collected by Australian Seed Federation will be used only for the purpose of representation of its Members as well as striving to deliver sustainability, leadership, integrity and collaboration on key issues including climate change, world food security, technological developments, trade, and the growth in productivity of Australian and international agriculture, through the delivery and supply of new and improved commodities and services to the market.

We will make you aware of the purpose for which we collect your information by notifying you about all the relevant matters of that collection.

We will not use your information for an unrelated secondary purpose unless we obtain your written consent or an exception applies, such as it is impracticable to obtain your consent and we believe that collecting, using or disclosing your information is necessary to lessen a serious threat to the life, health or safety of any individual.

#### 5.1 **Members**

We use Personal and Confidential Information of Members for purposes including compliance, administering membership rights and processing membership documents.

We may also supply our membership list (excluding Confidential Information) to government if required to comply with funding requirements.

We also use our Member lists to distribute information about our activities and identify persons interested in a directorship.

We will treat a Member's Confidential Information in accordance with the following clauses:

- 5.1.1 The Australian Seed Federation will use its reasonable endeavours to:
  - (a) maintain in confidence the Confidential Information;
  - (b) not use or permit to be used the Confidential Information for any purpose other than the Permitted Purpose;
  - (c) secure the Confidential Information and keep it secure;
  - (d) not divulge, communicate, reproduce, disclose or distribute the Confidential Information to any other person unless:
    - (1) required by law to do so;

- (2) the Australian Seed Federation has obtained the prior written consent of the Member; or
- (3) the disclosure is to an Authorised Person.

Any Member who wishes to enter into a confidentiality agreement with the Australian Seed Federation should contact the Chief Executive Officer.

## 5.2 **Prospective employees, directors, policy council members, working group members**

We use Personal Information about our prospective employees, directors, policy council members, working group members for predominately to consider the nomination.

## 5.3 **Website visitors**

As a general rule, we do not collect Personal Information about you when you visit our site. When you visit our site to read or download information, our web measurement tool and Internet Service Providers record only anonymous information for statistical purposes including:

- your server and IP address
- the name of the top level domain (for example, .gov, .com, .edu, .au)
- the type of browser used
- the date and time you accessed the site
- the pages accessed and documents downloaded
- the previous site you visited.

These statistics provide information to assist us to make improvements to the content and structure of our website. No attempt is or will be made to identify users or monitor their browsing activities, unless we are authorised or required to do so by law.

We may also collect personal information that you choose to give us via online forms or by email for example:

- You may subscribe to an electronic mailing list
- You may register to participate in training or an event through our online forms
- You may otherwise provide personal information using online forms provided by ASF

This information is collected for the purpose of responding to your query, processing the relevant transaction or other function of the online form. If you do not provide your personal information when using online forms, then ASF may not be able to process your request or complete the relevant transaction.

### *Cookies*

The ASF website site, like many others, uses small files called cookies to help us customise a user's experience.

Cookies are small text files that are stored by the browser (for example, Microsoft Edge, Google Chrome or Apple Safari) on a computer or mobile phone. They allow websites to



store things like user preferences i.e. Cookies provide a 'memory' for the website, so that it can recognise the user when they return to the site and respond appropriately.

A visit to a page on ASF's website may generate cookies to support Google analytics. This information will be used by ASF to optimise this website to improve access and useability, and to compile statistical data for reporting purposes.

#### 5.4 **Others**

Australian Seed Federation may also collect and use Personal Information from others for our operational, human resources, research referral or other corporate activities.

## 6 **MAINTAINING THE INTEGRITY, CURRENCY AND SAFETY OF YOUR PRIVACY INFORMATION**

This section explains how Australian Seed Federation holds your Privacy Information, how you can access your Privacy Information, update your Privacy Information, complain about an alleged breach of the APPs or make any related enquiry.

### 6.1 **Maintaining currency of your information**

Australian Seed Federation relies on accurate and reliable information to deliver necessary and effective services. If we are satisfied that any of the information we have about you is inaccurate, out-of-date, irrelevant, incomplete or misleading, or you request we correct any information, we will take reasonable steps to ensure the information held by us is accurate, up-to-date, complete, relevant and not misleading.

If we disclose your Privacy Information that is later corrected, we will, or else you may ask us to, notify the entity that received the incorrect information about that correction.

Should we refuse to correct the information, we will explain the reasons for refusal. We will also show you the complaint procedure if you wish to lodge a formal complaint about our refusal.

### 6.2 **Safety of your information**

All Privacy Information is securely stored using appropriate physical and/or electronic security technology, settings and applications, and by ensuring staff dealing with privacy information is trained in our privacy policies and procedures.

These policies are designed to protect Privacy Information from unauthorised access, modification or disclosure; and from misuse, interference and loss.

### 6.3 **Data Breaches**

A "notifiable data breach" under the Privacy Act occurs when:

- there is unauthorised access to, unauthorised disclosure of, or loss of, Personal Information; and
- the access, disclosure or loss is likely to result in serious harm to any of the individuals to whom the information relates.

If this happens, individuals who are affected must be told. The Australian Seed Federation also has a legislative obligation to notify the Office of the Australian Information Commissioner of the data breach.

## **7 ACCESSING YOUR INFORMATION OR LODGING A COMPLAINT**

### **7.1 Accessing and correcting information**

You are entitled at any time, upon request, to access your Privacy Information held by us. We will respond within a reasonable time after the request is made and give access to the information in the manner requested by you, unless it is impracticable to do so. We are entitled to charge you a reasonable administrative fee for giving you access to the information requested.

Should you be refused access to your information, we will explain the reasons for refusal - any exceptions under the Privacy Act or other legal basis relied upon as the basis for such refusal – and, if you wish to lodge a formal complaint about our refusal, we will explain the complaint procedure.

### **7.2 Security of Data and Security Breaches**

ASF implement appropriate technical and organisational measures to secure your Personal Information held by us against loss or any form of unlawful Processing.

These measures guarantee an appropriate security level given the risks associated with processing and the nature of the Personal Information to be protected. The measures are, in part, aimed at preventing unnecessary collection and further processing.

On request, we shall immediately provide you with all reasonable information relating to the security of Personal Information.

We will notify you (and any other party if required by law) without undue delay upon us becoming aware of a data breach affecting your Personal Information, providing you with sufficient information to allow you to meet any obligations to report or inform data subjects of the Personal data breach under the Data Protection Laws.

We will cooperate with you and take such reasonable commercial steps as are directed by you to assist in the investigation, mitigation, and remediation of each such Personal data breach.

### **7.3 Lodging a complaint**

Should you wish to complain about a potential breach of this Privacy Policy or the APPs please contact our Chief Executive Officer.

The Chief Executive Officer will make good faith efforts to rectify the issue and respond within a reasonable period after the complaint is made.

### **7.4 Contact details**

Chief Executive Officer  
Australian Seed Federation Limited  
Phone: 02 6282 6822

Email: [enquiry@asf.asn.au](mailto:enquiry@asf.asn.au)