

## **Privacy Policy**

19 January 2023

# RECORDS AND INFORMATION MANAGEMENT PRACTITIONERS ALLIANCE

Advancing and Connecting the Records and Information Management Profession



## **TABLE OF CONTENTS**

DOCUMENT CONTROL	2
AMENDMENT, MODIFICATION OR VARIATION	2
1 ABOUT THIS POLICY	3
2 OVERVIEW OF THIS POLICY	3
2.1 Collection of personal information	4
3 DIRECT COLLECTION	4
3.1 Membership	4
3.2 Education and Training	4
3.3 Events	4
3.4 Surveys	5
4 INDIRECT COLLECTION MEMBERSHIP	5
4.1 Non-members	5
4.2 Research	5
5 USE OF PERSONAL INFORMATION	5
5.1 Sound and Image Recordings of Events	5
5.2 Marketing Communications	5
5.3 Events	6
5.4 Publications	6
5.5 Contractors and Partners	6
5.6 Disclosure with Consent	6
5.7 Where Authorised or Required by Law	7
5.8 Overseas Disclosure	7
6 OUR WEBSITES, EMAILS, APPS AND SOCIAL MEDIA	7
6.1 Our Websites	7
6.2 Emails	8
6.3 Apps	8
6.4 Social Media	8
6.5 Cookies	8
6.6 Security of Personal Information	8
6.7 Retention of Personal Information	9
6.8 Access to and the Accuracy of Personal Information	9
7 CHANCING THE POLICY	



## **DOCUMENT CONTROL**

Version	Date	Author(s)	Approval	Comments
1.0	31 January 2019	Jack Anthony	RIMPA Board	
2.0	11 January 2023	Anne Cornish	RIMPA Board	

## AMENDMENT, MODIFICATION OR VARIATION

- (a) This Policy is effective from 19 January 2023 and is reviewed every two years.
- (b) This Policy may be amended, varied or modified by the Records and Information Management Practitioners Alliance Global (RIMPA Global) Board.



#### 1 ABOUT THIS POLICY

This PRIVACY POLICY (Policy) sets out the information handling practices of RIMPA Global. It does not cover personal information about employees.

RIMPA Global strives to manage personal information in a best practice way, while enabling to better serve our membership and the community.

Personal information refers to information or an opinion, true or false and whether recorded in a material form or not, about an identified or reasonably identifiable individual. Sensitive information is a sub-category of personal information and includes details about race, ethnicity, political affiliations and membership of professional trades and associations. Personal and sensitive information is handled in accordance with related Commonwealth Legislation and this Policy.

#### 2 OVERVIEW OF THIS POLICY

The primary goals of RIMPA Global are to promote records and information management.

The functions and activities we carry out to achieve these goals, and for which personal information is collected and held include:

- managing the membership of RIMPA Global
- conducting educational and training courses
- holding events such as conferences and briefings on current issues
- providing products and services
- providing and exchanging information through various channels such as newsletters, other publications such as iQ, social media sites, our websites and mobile applications (apps)
- lobbying and making submissions to government and others about improving laws and practices
- promotion of ethical practice and sound corporate governance
- carrying out a range of research, data collection and analytical activities to:
  - identify member and prospective members' needs and to ensure our products and services meet those needs
  - o identify prospective members and provide marketing approaches designed to recruit new members
  - provide up-to-date information to support lobbying activity and make submissions on issues and proposed laws
- entering relationships with sponsors and other partners to financially support RIMPA Global's activities
- providing information and services digitally and online through our websites and apps as well as via email, online advertisements and social media. In some cases, third party service providers (service providers) are relied on to supply these services. Service providers may use cookies and other technologies to conduct activities which allows the information and online services to be supplied



 Undertaking activities, either directly or through our service providers, such as surveys, online behavioural advertising, website analytics and email campaign management

If personal information is not supplied, RIMPA Global may be unable to provide information, services or products, make offers or tailor the content of our websites or apps. In this event, the recipient may find they do not experience the full extent of RIMPA Global's information, products and services, including our websites and apps.

#### 2.1 Collection of personal information

Personal information is collected for the purposes stated in this Policy from members, non- members, participants in our courses, third parties, service providers, suppliers, contractors, consultants, vendors, partners and individuals who interact with RIMPA Global.

#### 3 DIRECT COLLECTION

#### 3.1 Membership

RIMPA Global collect and hold information from members or prospective members through membership related applications. This information includes name, contact details, and career history. Date of birth details are also collected to enable the unique identification of members and to assess what products and services may be most suitable and of interest. Date of birth details is protected by limiting access to this information.

RIMPA Global keep information prospective members have entered when they start, but do not complete, an online membership application form to enable contact about becoming a member.

For ongoing membership management, personal information is collected from members about the reasons for reducing the level of membership such as proof of ill health, parenthood, study or travel.

For upgrading and renewal of membership the following information is collected (with consent), criminal history, evidence of bankruptcy and referee comments.

For student membership, course and study information is collected as evidence to support membership application.

#### 3.2 Education and Training

RIMPA Global collect and hold enrolment information from members and non-members and keep a record of the courses completed. Assessment answers, course results and feedback sheets are also collected. Special protections around this information including separate storage, and technical and policy restrictions on who can access the information.

#### 3.3 Events

RIMPA Global collect and hold information which members and non-members provide through applications to attend events such as conferences and briefings. This includes, if applicable:

- sensitive information such as dietary or mobility requirements
- travel bookings
- image (video or photographs) or sound recordings (only if you have not opted out upon registration)



• a record of the events and workshops a member or non-member has attended

#### 3.4 Surveys

RIMPA Global or our service providers may collect personal information via surveys. The personal information collected will only be used for analytical purposes, updating records or to assist with improvement or development of our products and services. By completing these surveys, the person completing the survey accepts that their personal information may be transferred outside Australia.

#### 4 INDIRECT COLLECTION MEMBERSHIP

RIMPA Global collect information indirectly about members, but only in circumstances where a member would reasonably expect it, or where the member has consented. Examples include referee comments and criminal history checks for some membership related applications.

#### 4.1 Non-members

To expand our membership, information is collected indirectly about prospective members through methods which include word of mouth referral, publicly available sources, and through commercial list brokers.

#### 4.2 Research

RIMPA Global commission market research about members and non-members. The information collected and held gained from the research in aggregate form and do not connect it with any records held about individual members or non-members.

#### 5 USE OF PERSONAL INFORMATION

RIMPA Global use personal information collected and held through membership, educational and training course and event applications or attendance to:

- administer and meet member requirements for the particular service, course, event or program
- help us improve the particular service, event or program
- record professional development units as part of the member's professional development program
- identify and analyse member and non-member activities and interests in order to better meet member needs and attract new members
- enable targeted marketing communications to members and non-members
- enable RIMPA Global to further its mission

RIMPA Global will not use your personal information for any purpose which you would not reasonably expect unless it is consistent with the *Information Privacy Act 2009 (Qld) (IP Act)*. If RIMPA Global believe a member may not expect a particular use of information consent is sought before it is used for that purpose.

#### 5.1 Sound and Image Recordings of Events

RIMPA Global use sound and image recordings of our events to enable improvement of our events, and for promotional purposes. At the time of registration for an event, you will be able to indicate if you do not want your voice or image used. You can also contact RIMPA Global if you want to express your preference.

#### 5.2 Marketing Communications

Advertising and marketing material, content, information and communications (marketing material) is sent to members and non-members whom records are held to provide information about RIMPA Global's products and



services which may be of personal and/or professional benefit. These products or services may extend beyond those provided by RIMPA Global and include offers from third parties.

Marketing materials may be sent by mail, telephone, email, SMS or other electronic methods, such as through social media or targeted advertising. If you indicate a preference for a method of communication, that method will be used where it is practical to do so.

When you access our websites, customised marketing material may be displayed to you based on data stored in your cookies – you accept that your opt-out options may be different for this kind of marketing. Service providers used, including remarketers, may also display our marketing material on other parties' websites that you visit. The display of that marketing material may be based on your prior visits to our websites and other internet activity. Data supplied by service providers to improve our marketing material and advertising campaigns may also be used.

RIMPA Global gives you the chance to opt-out of receiving marketing material in our communications with you, such as forms, letters, or emails, or you can opt out by contacting <a href="mailto:admin@rimpa.com.au">admin@rimpa.com.au</a> or log-in to our websites.

Unless you have opted out, marketing material to members and non-members until 12 months after cessation of membership, or, in the case of non-members, 12 months after your last interaction with us will be provided.

Disclosure (sharing) of personal information Sensitive information

RIMPA Global only disclose sensitive information such as health information or criminal history for the purposes for which it was provided or for directly related purposes you would reasonably expect.

#### 5.3 Events

RIMPA Global disclose the name, title and post nominal details of event participants to speakers, organisers, hosts or facilitators under strict conditions to enable them to carry out their role in relation to an event, for example, to organise table lists, or facilitate introductions. This information is also disclosed to sponsors and potential sponsors to enable them to assess whether or not to sponsor an event and disclose this to providers of special member offers from time to time under strict conditions.

#### **5.4 Publications**

RIMPA Global discloses information about members to other members via RIMPA Global publications.

#### 5.5 Contractors and Partners

RIMPA Global disclose personal information to contracted service providers who assist with several functions and services including service providers of technology, data processing, contact centre, legal, accounting, business consulting, auditing, archival, delivery, banking, payments, market research, content production and mailing but only for the purpose of fulfilling those services.

Information is disclosed to partners in some programs, for example, about applicants for scholarships to assist with scholarship candidate assessment.

#### 5.6 Disclosure with Consent

With your consent, personal information is disclosed in a number of circumstances including:

• to employers of those who have completed an educational course and recruitment companies



• to Australian and overseas regulatory authorities or other organisations to assist them with business licensing or due diligence purposes. This could include the fact that you are a member of RIMPA Global, the nature of your membership and RIMPA Global courses you have completed

#### 5.7 Where Authorised or Required by Law

As authorised by the Information Privacy Act. RIMPA Global disclose personal information in connection with law enforcement activities by enforcement bodies, for example, Australian Securities and Investments Commission investigations or other investigations into suspected fraud or unlawful activity.

RIMPA Global are required by the *Corporations Act 2001 (Cth)* to allow an individual to inspect RIMPA Global's member register and view current and past members' names and addresses. However, the Corporations Act prohibits the individual from using the information gained to contact or send material to members, and from using it for other prescribed purposes.

#### 5.8 Overseas Disclosure

From time to time, your personal information may be sent overseas. Where a service provider is used that hosts personal information in other countries, reasonable steps will be taken to ensure that the host does not breach the Australian Privacy Principles. The steps taken include:

- adding provisions in our contract with the service provider that require them to protect the personal information they hold
- when choosing a service provider, including in our considerations the privacy law or scheme (if any) that
  applies in the country in which the service provider operates

If RIMPA Global have your consent, or the overseas recipient is located in a country whose privacy laws are the same or substantially similar to those of Australia, we comply with the Australian Privacy Principles when disclosing your personal information to that overseas recipient.

If a privacy breach occurs that involves a service provider located outside Australia, RIMPA Global support and work with members or non-members in handling the breach.

## 6 OUR WEBSITES, EMAILS, APPS AND SOCIAL MEDIA

#### 6.1 Our Websites

When you visit our websites or download, access or register to use our websites, (which may also include the use of any of our products, services or apps) your personal information such as your name, address, email address, phone number, date of birth, username, password and other information may be collected. Information automatically, including technical information related to your mobile device, your device's unique identifier, your mobile network information, the type of mobile browser you use and information about the way you use our products, services or apps may also be collected.

Depending on the particular product, service or app you use, and only after you have agreed to such collection, information stored on your device, including contact information, location information or other digital content may be collected.

RIMPA Global or service providers use web analytics to collect a range of information about your interactions with our websites. Web analytic software collects the information using a number of techniques including



cookies (both first and third party) and Java Script. Web analytics are also used to collect information from the browsers of those who use our websites or participate in RIMPA Global LinkedIn group.

The information collected includes IP address, domain name, date and time of visit, the pages visited and time spent on each page, whether you have visited the site before and what site referred the visitor to the web page. This information is used to evaluate the effectiveness of our websites and the level of interest in particular pages or RIMPA Global's campaigns.

RIMPA Global's websites may contain links to other sites. RIMPA Global is not responsible for the privacy practices or policies of those sites and recommend that you review the privacy policies of those other sites.

#### 6.2 Emails

If you send RIMPA Global an email, that address will be recorded automatically by our e-mail messaging system for the purpose of replying to your e-mail. However, for normal communication with you, the e-mail address you provide in your membership application/renewal, unless you advise for a different e-mail address.

When RIMPA Global send you emails or other electronic messages, information about your interactions with the email including when and where you open the message and interactions with particular links is recorded.

This helps to better understand what information is of interest to you and to improve the content.

#### 6.3 Apps

When you access our apps via your mobile device, a service provider collects username details to authenticate access to member-only content. RIMPA Global do not review or use this information for any purpose beyond authentication with our membership database.

#### 6.4 Social Media

RIMPA Global participate in social media platforms. If it is deemed relevant to the quality of service that RIMPA Global provides or its objectives, the nature of the topic discussed by a particular individual and their name and follow up with further conversation offline about which we take notes will be recorded.

Social media services also handle your personal information for their own purposes. These sites have their own privacy policies. RIMPA Global is not responsible for the privacy practices or policies of those sites and we recommend that you review their privacy policies.

#### 6.5 Cookies

RIMPA Global's server automatically recognises and stores the domain name of visitors to our websites. In addition, our websites use cookies (both first and third party) which may automatically collect information from you such as pages viewed.

A cookie is a packet of information stored on your computer that allows our server to identify and interact more effectively with your computer. RIMPA Global also use cookies for tracking the statistics of our websites to better understand your needs and interests as well as improve the layout and functionality of our websites.

#### 6.6 Security of Personal Information

RIMPA Global regularly assess the risks of misuse, interference, loss, unauthorised access, modification or disclosure of personal information and ensure that we have adequate measures, including policies, procedures and technology, to address those risks. For example, staff access to personal information to that which they



need to carry out their role is limited. Regular internal and external audits are conducted to assess whether we have adequately complied with or implemented these measures.

#### 6.7 Retention of Personal Information

Personal information will be managed in line with Australian Privacy Principles.

#### 6.8 Access to and the Accuracy of Personal Information

You have a right to ask for access to the personal information RIMPA Global hold about you. Unless there is a lawful reason not to, RIMPA Global will give you access to it and allow you to correct any incorrect information.

RIMPA Global will ask you to verify your identity to ensure your information isn't given to the wrong person. If RIMPA Global don't give you access to your personal information or refuse to correct it, you will be notified why. You may request to make a note of your requested correction to be located alongside information RIMPA Global have not agreed to correct.

RIMPA Global take your privacy concerns seriously. Where you express any concerns, your privacy has been interfered with or seek access to information about you that is held, a response within 48 hours will be provided and the details on who will be handling your matter and when you can expect a further response.

If you are unsatisfied with our response you can submit a complaint to the Office of the Australian Information Commissioner.

#### 7 CHANGING THIS POLICY

RIMPA Global will amend this Policy from time to time and notify you of any amendments through our publications.

Any amendments to this Policy will be effective immediately upon being posted to our websites. Your use of our websites, products or services following such amendments represents your acceptance to be bound by the Policy, as amended.