

# PRIVACY POLICY

Version: 3.0

Classification: AARNet Official

Last updated date: 1/7/2025

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## VERSION CONTROL

Version No.	Nature of Change	Prepared by	Version Date
1.0	Privacy Policy document	AARNet Legal	February 2018
2.0	Update to the Privacy Policy with clarifications on collection and disclosure	Privacy Officer/ AARNet Legal	November 2022
3.0	Update to the Privacy Policy to apply to AARNet Group companies and include additional collections	Privacy Officer/ AARNet Legal	June 2025

# 1. POLICY SCOPE AND UPDATES

AARNet Group Companies ('AARNet', 'we', 'us', 'our') are committed to protecting the privacy of individuals with whom they deal. We handle personal information we collect and hold in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs) in the Privacy Act and to the extent applicable, health records law.

This Privacy Policy explains how and for what purpose AARNet collects information about you, who we disclose your personal information to, how you may access and seek correction of the personal information we hold about you, how to complain about a breach of your privacy and how we will deal with your complaint.

We may amend or update this Privacy Policy from time to time if our practices or legal requirements change. The latest version of this Policy will appear on AARNet's website at <https://aarnet.edu.au/privacy-policy/>.

This Policy does not apply to the information contained in AARNet employee records.

## 2. WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

The types of personal information AARNet collects about you depends upon who you are, the nature of our relationship with you and your dealings with us.

Personal information is any information or opinion we collect and/or hold about an identified individual, or an individual who is reasonably identifiable to us and includes sensitive information such as information about your health, race or ethnic origin, membership of a professional or trade organisation and criminal record. We will only collect sensitive information about you with your consent (which may be express or inferred from your conduct) unless otherwise required or authorised by law.

Personal information that we collect from you may include:

- » your personal and/or professional contact details (such as name and job title, address, email address, phone number, mobile phone number);
- » information contained in opinions expressed or information provided by client or supplier personnel;
- » payroll details such as your bank, salary and leave details, emergency contacts if we provide your employer with payroll services;
- » professional details in relation to your interaction with us, such as your qualification, experience, training, education and professional associations details provided to us by you or by another party;
- » authentication details for you to log in to various online services we provide;
- » if you attend an event organised by us, details you provide to us in order to register at the event such as contact details, dietary requirements, credit card details and photographs we may take of you at the event;
- » any information you provide in connection with an enquiry or complaint or request for assistance or product support that you may submit to us in writing or by phone;
- » information from interviews and blogs we may publish;
- » information such as your name and email address if you subscribe to a newsletter or alert service provided by us;
- » photos of you, audio visual recordings, or any other information where you choose to upload or provide into our systems and during interactions;
- » personal information collected via the social media platforms such as Twitter, Facebook and LinkedIn used by AARNet;
- » information contained in data or material, including sensitive information, that you have stored in hosting services provided by us, solely for the purpose of providing administrative or support services;

- » information provided to us by your employer for the purpose of providing services;
- » user logs which may include metadata, captured by the system in the use of products, network or services; and
- » other information provided to us when we, our contractor or agent communicate with you.

### 3. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Wherever possible, we will collect your personal information directly from you, such as when you contact us, sign up for an account on our website, subscribe to our newsletter, login to use our services via our portals, apply for a job with us, provide services to us, are interviewed for one of our publications, attend one of our events or where we provide a service to an organisation where you may be enrolled as a student or may be an employee, contractor or visitor. We may also collect your personal information from your employer or service provider (if your employer or service provider is a customer of AARNet or engages AARNet to provide services to it, including payroll services), from our partners, or from third parties such as those organisations that we retain to provide services to us.

We may receive unsolicited personal information about you directly from you or from another party. Where we receive such unsolicited information, we will first determine whether we could have collected the information from you as set out in this policy or under the Privacy Act. Were we to find that that information could not have been collected from you directly as permitted under the Privacy Act, we will either destroy or de-identify that information if it is lawful to do so; or where it is not possible to destroy or de-identify such information or we find that we could have collected that information from you directly, we will handle such information in accordance with this policy and the Privacy Act, including taking reasonable steps to notify you that the information has been collected and the purpose for which it has been collected.

### 4. OUR USE OF COOKIES

Information about your visit (session and log in) to our websites will be automatically collected through the use of cookies, unless cookies are disabled, and by viewing our websites you accept the use of cookies. A cookie is a small piece of data shared between a web server and a user's browser that the website uses to give the server information about a user's identity and website visiting patterns and preferences. We cannot identify you individually through cookies.

The use of cookies is standard, and most websites use them. Most internet browsers are pre-set to accept cookies. If you prefer not to receive cookies, you can adjust your internet browser to refuse cookies or to warn you when cookies are being used. However, if you disable cookies, this may affect the functionality of our websites for you.

## 5. CAN YOU CHOOSE TO REMAIN ANONYMOUS OR USE A PSEUDONYM WHEN DEALING WITH US?

You may elect not to identify yourself or you may use a pseudonym in your dealings with us, except where it is impracticable or would be unlawful for us to deal with you on this basis.

It will not always be possible for AARNet to interact with you anonymously. Given that AARNet is providing network services and needs to comply with applicable legislation governing the use of such services, it needs to be able to identify, in some circumstances, the individuals with whom it is dealing when providing those services and also needs to be able to verify the identity of users who access its services through its portals.

## 6. WHY DO WE COLLECT AND USE YOUR PERSONAL INFORMATION?

AARNet collects personal information to:

- » deliver and market our products and services including providing technical support;
- » enter into appropriate legal and contractual arrangements;
- » process payments for goods and services we purchase;
- » provide payroll services to your employer;
- » communicate with and respond to queries or complaints from our customers;
- » deliver our newsletter and other communications with our education and research communities;
- » manage our customer records, when an individual signs up for a new product or service on behalf of themselves or their employer;
- » verify the identity of individuals who access our services;
- » organise and manage events;
- » develop our partnerships;
- » assess a job or service application with us where you are apply for a job or seek to provide a service to us;
- » publish blogs and reports of events and interviews;
- » validate and ensure required qualifications are in place and parties can meet WHS or corporate requirements;
- » provide the appropriate access to our systems, facilities, assets and personnel;
- » facilitate access to our sites such as our offices, customer sites, CEVs and data centres;
- » manage required communications and activities for us to conduct our business;
- » protect and ensure the security of our business, networks and services; or
- » to improve our product and services.

### DIRECT MARKETING

We may use or disclose your personal information to send you marketing communications about our products, services and events via email. You can opt out of receiving our direct marketing communications at any time by clicking on the “unsubscribe” link at the end of each communication or emailing [media@aarnet.edu.au](mailto:media@aarnet.edu.au).

## 7. WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, INCLUDING OVERSEAS?

AARNet may disclose your personal information (including, in certain limited circumstances, your sensitive information) to:

- » our third party service providers, agents and contractors who provide financial, legal, administrative, IT or other services in connection with the operation of AARNet's business and services, including but not limited to, software developers, third party systems, IT product suppliers, maintenance providers, hosting providers, data centres, consultants, and lawyers;
- » companies within our corporate group, our affiliated entities and/or service partners for business purposes.
- » foreign customers, where correspondence between AARNet and the foreign customer contains the personal information of individuals, where the country to which the information may be disclosed will be any country where the foreign customer is located;
- » to a law enforcement or investigative body as required under law;
- » to your employer or education provider or the organisation that on-provides you AARNet services, if requested by them, in connection with a service that you access under an agreement between them and us, or a service we provide you directly which you are eligible to access due to your employment or enrolment at that institution or organisation.

In addition to the above, AARNet may also disclose your information to another party if it has otherwise been agreed with you.

## 8. HOW DO WE HOLD AND KEEP YOUR PERSONAL INFORMATION SECURE?

AARNet holds your personal information in electronic files on its platforms and databases or in hard copy files. We may combine personal information we receive about you with other information we hold about you. This includes information received from third parties.

AARNet takes all reasonable steps to ensure that the personal information we hold is protected from misuse, interference and loss, and unauthorised access, modification or disclosure through various methods, including password and authorisation protection, security testing and depending on the service, data encryption.

When your personal information is held or accessed by a third party provider, such as a cloud service provider, we require them to keep it secure and only use or disclose it for the purpose for which it was provided or as required by law.

Once AARNet no longer requires your personal information for any permitted purpose, it will be securely destroyed and/or permanently de-identified.

Please contact us immediately if you believe that there has been any unauthorised access, modification, interference or disclosure of your personal information that we may hold.

## 9. HOW CAN YOU SEEK ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION?

You may request access to or correction of your personal information by writing to us or contacting us at any time at the details below.

We will need to verify your identity before we can correct it or give you access. We will promptly acknowledge receipt, and we will endeavour to respond to your request within a reasonable time.

AARNet may refuse access to some or all of your personal information if required or permitted by law, such as where providing access would have an unreasonably impact upon the privacy of other individuals or would reveal commercially sensitive information. If we do, we will explain in writing why and how to complain if you are not satisfied with our decision.

You may also ask us to correct any of your personal information you believe is inaccurate, incomplete, out-of-date or irrelevant. We will take reasonable steps to correct it unless we disagree with your reasons. If we refuse your request, we will explain why in writing and how to complain if you are not satisfied with our decision. You can also ask us to associate a statement about your request with the information.

## 10. HOW DO YOU MAKE A PRIVACY COMPLAINT?

If you believe that AARNet has handled your personal information inconsistently with this Policy or its privacy obligations, you can make a complaint using the contact details below or the contact form on our website.

We will acknowledge receipt of your complaint promptly and may need to verify your identity and ask you to provide further information to enable us to investigate your complaint.

We will investigate your complaint and notify you of our decision and offer any resolution that we consider appropriate within a reasonable time.

If you are not satisfied with our resolution of your complaint, you can contact the Office of the Australian Information Commissioner at:

**GPO Box 5218 Sydney NSW 2001**

Telephone: 1300 363 992

[www.oaic.gov.au](http://www.oaic.gov.au)

## 11. HOW DO YOU CONTACT AARNET?

If you have any questions or comments about this Privacy Policy or wish to request access to or correction of your personal information or you wish to make a complaint, please contact:

**The Privacy Officer**

PO Box 5519, Chatswood, NSW 1515

Email: [privacy@aarnet.edu.au](mailto:privacy@aarnet.edu.au)