

# **NAFC Policy 006**

## **Privacy Policy**

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## 1. INTRODUCTION

- 1.1. National Aerial Firefighting Centre (**NAFC**) is committed to responsible privacy practices and complying with relevant legislation.
- 1.2. This policy sets out how NAFC complies with its obligations and how it collects, uses, stores, manages, and discloses personal information.

## 2. POLICY

- 2.1. NAFC is committed to responsible privacy practices and the protection of private and personal information.
- 2.2. NAFC will take all reasonable steps to comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) including any amendments.
- 2.3. NAFC will take all reasonable steps to comply with the Australian Privacy Principles (**APPs**).
- 2.4. From time to time NAFC may alter this policy at its discretion, and in accordance with any changes to legislation and regulations.
- 2.5. NAFC will ensure that the latest version of this policy is available from the website at [www.nafc.org.au](http://www.nafc.org.au). It is also available by contacting the NAFC office.

## 3. WHAT IS PERSONAL INFORMATION?

- 3.1. In this policy personal information has the same meaning as that of the Privacy Act. Under the Privacy Act, personal information means information or an opinion about an individual who is identifiable and which is recorded, whether or not it is recorded in a material form.

## 4. WHAT TYPES OF INFORMATION DOES NAFC COLLECT?

- 4.1. From time to time NAFC will collect and use personal information. The types of personal information collected by NAFC depends on the circumstances.
- 4.2. NAFC may collect personal information such as: name, address, email address and telephone and fax numbers, employer, employer address and employment position.
- 4.3. NAFC collects personal information to:
  - a. provide goods and/or services to an individual, company or Member;
  - b. receive goods and/or services from an individual, company or Member;
  - c. contact an individual;
  - d. consider employment applications and manage employee relations;
  - e. respond to concerns, complaints or issues raised by an individual or company to or about NAFC;

- f. facilitate the conduct of business transactions and operations between NAFC and an individual and/or third parties;
- g. allow NAFC to conduct its business and operations;
- h. to provide information to NAFC Members, and their agencies, contractors, and other service providers engaged by NAFC to deliver goods and services or to otherwise act on behalf of NAFC, or to provide goods and services to NAFC;
- i. provide newsletters, training resources, updates or subscription services to individuals;
- j. ensure that NAFC's website at [www.nafc.org.au](http://www.nafc.org.au) remains relevant to individuals; and
- k. provide information based on an individuals' area of interest.

## **5. HOW DOES NAFC COLLECT PERSONAL INFORMATION?**

- 5.1. NAFC collects most of the personal information it requires directly from the relevant individual by way of written or electronic forms, voluntarily completed by an individual. NAFC may also collect personal information from individuals, by telephone, from the NAFC website, NAFC ARENA (refer to section 11), in person or by written correspondence.
- 5.2. From time to time, where necessary, NAFC may also collect information from third parties, such as from an individual's employer or nominating organisation (such as for event attendance or committee or group members or from third parties entering information into ARENA).
- 5.3. When NAFC receives unsolicited private information from third parties it will check that the information is reasonably necessary for NAFC business, activities and operations. If it is, that information will be handled in accordance with this policy and NAFC will take reasonable steps to notify the individual of the collection. If not, NAFC will contact the individual to obtain consent to hold the information, or destroy or de-identify the information in accordance with the Privacy Act.
- 5.4. NAFC reserves the right to collect personal information as otherwise permitted or required by law.

## **6. SENSITIVE INFORMATION**

- 6.1. NAFC does not generally require individuals to disclose any sensitive information such as details of race, religious beliefs, etc.
- 6.2. If for any reason NAFC collects sensitive information regarding an individual (for example, collecting the health information of an employee or individual from an aircraft operator) then NAFC will only use and disclose that information for the purpose for which it was collected and as permitted by the Privacy Act and other relevant legislation.

## **7. USE AND DISCLOSURE OF PERSONAL INFORMATION**

- 7.1. NAFC will only use or disclose information for the primary purpose for which it was collected or for a directly related secondary purpose which the individual would reasonably expect NAFC to use or disclose for the secondary purpose, and only in accordance with the Australian Privacy Principles.
- 7.2. NAFC may disclose personal information such as contact details for those persons who participate in group activities or research, or belong to a special interest group. However, this personal information will not be disclosed without the individual's consent.
- 7.3. Occasionally NAFC 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.
- 7.4. Direct marketing involves communication directly with an individual to promote products, services, conferences and events from NAFC or NAFC approved contractors, event exhibitors, sponsors or partners. NAFC may employ a range of delivery methods – such as SMS, email, mail or telephone. Any individual can unsubscribe from NAFC direct marketing or change their contact preferences by notifying NAFC in accordance with section 15 of this policy.
- 7.5. An individual also has the option of not identifying themselves to NAFC or by using a pseudonym. However, withholding personal information, or using a pseudonym or remaining anonymous may result in NAFC not being able to provide the individual with requested services and it may mean that an individual cannot participate in some NAFC activities.
- 7.6. NAFC 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 NAFC to provide services to or deal with the individuals.

## **8. TO WHOM DOES NAFC DISCLOSE PERSONAL INFORMATION?**

- 8.1. NAFC may disclose personal information to third parties in accordance with this policy and the Privacy Act in connection with the purposes described above.
- 8.2. This may include disclosing an individual's personal information, including but not limited to:
  - a. Members of NAFC (each of the States and Territories of Australia) and their fire and emergency service agencies. These Members and government agencies are also bound by the Privacy Act or other similar legislation;
  - b. NAFC contractors or service providers, including aircraft operators and providers of Information Technology, telecommunication services, mailing operations, events or conferences;
  - c. NAFC's accountants, lawyers and insurers and auditors;
  - d. NAFC partners under current or future agreements, including but not limited to AFAC and others;
  - e. any third parties an individual has directed or permitted NAFC to disclose their personal information to;

- f. third parties that require the information for law enforcement to or prevent a serious threat to life, health or safety or an individual or the public; and
  - g. as otherwise permitted by law.
- 8.3. Where NAFC 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. NAFC's efforts will include, but not be limited to, suitable privacy and confidentiality clauses in agreements with third parties to whom NAFC discloses personal information.
- 8.4. NAFC does not sell or licence an individual's personal information to third parties.

## **9. DOES PERSONAL INFORMATION LEAVE AUSTRALIA?**

- 9.1. Some of the third parties that NAFC conducts business with may be located outside Australia, or may store information on computing systems located outside Australia. These third parties may include but are not limited to aviation operators, fire and emergency service agencies overseas, service providers or NAFC's partners and/or contractors under current or future agreements.
- 9.2. The countries in which these third parties or systems are located will vary. In the course of business NAFC may disclose personal information to parties located around the world; or may store information on systems located around the world. For example NAFC may disclose personal information, such as an individual's name, to a foreign aircraft operator or government agency regarding aerial firefighting or emergency management operations in Australia.
- 9.3. Except where an exception applies under the Privacy Act, NAFC will take reasonable steps to ensure that overseas recipients do not breach the APPs in the Privacy Act in relation to that information.
- 9.4. Except where an exception applies under the Privacy Act, NAFC will take reasonable steps to protect private information that is collected on behalf of NAFC and stored on computer systems located outside of Australia.

## **10. EMAIL LISTS**

- 10.1. NAFC may collect an individual's email address and other contact details when an individual subscribes to a NAFC mailing list. NAFC only uses this information for the purpose of sending individuals regular updates, newsletters, annual reports etc about NAFC and to administer the mailing list.

## **11. ARENA**

- 11.1. NAFC and its Members have collaborated to create and develop ARENA, a system to support the management of aerial firefighting and emergency resources across Australia. ARENA is managed by NAFC on behalf of its Members, however, all of the data is entered by Registered Users of ARENA who are responsible for its accuracy and currency.

- 11.2. Any personal or sensitive information entered into ARENA will be treated in accordance with this policy and the APP's in the Privacy Act.

## **12. STORAGE AND SECURITY OF PERSONAL INFORMATION**

- 12.1. NAFC will take reasonable steps to ensure the security both in hardcopy and electronically of the personal information it collects and holds. This involves protecting the personal information from misuse, loss, unauthorised modification and disclosure.
- 12.2. All of those who work directly for NAFC are bound by a confidentiality agreement which forms part of NAFC's Probity and Integrity Policy and is consistent with this policy.
- 12.3. The electronic databases that hold information, as well as NAFC's internal hardcopy systems seek to protect the security of personal information.
- 12.4. When the personal information is no longer required NAFC will destroy it in a secure manner.

## **13. ACCURACY AND ACCESS TO PERSONAL INFORMATION**

- 13.1. NAFC will as far as reasonably possible maintain an individual's personal information as accurate, complete and up to date.
- 13.2. All individuals are encouraged and welcome to contact NAFC to access a copy of their personal information, or to notify NAFC of corrections or updates to their personal information or its collection, use or disclosure, or if they have any questions about the collection, use or disclosure of their personal information.

## **14. USE OF COOKIES ON NAFC WEBSITE**

- 14.1. NAFC's website(s) allow anonymous browsing and do not require a user to identify themselves unless they wish to register for a service.
- 14.2. When using the NAFC website(s) or through social media NAFC 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 NAFC website that were requested, the date and time of those requests and the country the individual is in. Except where provided to NAFC on the website NAFC does not collect personal information such as name, mailing address, email address or phone numbers when an individual is browsing the NAFC website.
- 14.3. NAFC will use information from its website(s) to create aggregate statistics about usage and other related site information that does not personally identify users.
- 14.4. If an individual posts information to certain public parts of the NAFC website or to any social media pages operated by NAFC, the individual must acknowledge and accept that the information will be publicly available.

## 15. CONTACT

- 15.1. Any individual with questions, corrections to personal information, concerns or complaints about this Policy or its application can be directed to:

NAFC General Manager  
Level 1, 340 Albert Street  
East Melbourne VIC 3002  
Telephone: (03) 9418 5252  
Email: [info@nafc.org.au](mailto:info@nafc.org.au)  
Website: [www.nafc.org.au](http://www.nafc.org.au)

- 15.2. NAFC takes all matters regarding privacy seriously and will assess all questions, corrections, concerns or complaints accordingly. NAFC 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.

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

Office of the Australian Information Commissioner  
Address:  
GPO Box 5218 Sydney, NSW 2001  
Or  
GPO Box 2999 Canberra ACT 2601  
Or  
Level 3, 175 Pitt Street, Sydney, NSW 2000  
Telephone: 1300 363 992  
Fax 02 9284 9666  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)