



AUSTRALIAN
AIRPORTS
ASSOCIATION

AAA Privacy Policy

November 2023

This Privacy Policy sets out how the Australian Airports Association (**AAA**) (ACN 008 647 336), ABN 89 008 647 336 protects the privacy of Personal Information that is collected through the AAA website and other products or services offered. The AAA is committed to ensuring that your privacy is protected.

This Privacy Policy is governed by the Australian Privacy Principles under the Privacy Act 1988 (Cth) and where we obtain Personal Information from a data subject located in a member state of the European Union, the European Union General Data Protection Regulation (Regulation (EU) 2016/679) (the EU GDPR).

The AAA requires Personal Information for you to best use the AAA website, attend events, undertake education and other products or services (**engaging with the AAA**).

This Privacy Policy may be amended, changed, undergo additions and deletions, at our sole discretion. You should check this page regularly to ensure that you are aware of any changes.

1. Types of personal information collected and held

The information the AAA collects may include:

- names;
- employer and job title;
- contact information, including email address;
- information about your business or personal affairs;
- information about your vocational needs;
- other information relevant to member surveys and/or promotions;
- any other information requested on AAA website or otherwise required by us or provided by you; and
- any **Personal Information**, as defined under the Privacy Act.

We collect Personal Information from a variety of sources, which may include:

- via our industry partners' associations or other bodies which are a member or affiliated with the AAA;
- when you subscribe to AAA publications and email;
- when you enter Personal Information into, or agree to having your Personal Information entered into, one of our online systems;
- when you access the members centre;
- when you contact and interact with us via email, telephone, mail or engage via social media;
- when you participate in any program, activity, competition or event run by the AAA;
- when you apply for employment; and
- where we are required to do so by law.

If you engage with the AAA, we automatically record the following information in log files:

- Your Internet Protocol (IP) address. The IP Address is a unique numerical identifier used by computers and other devices to identify and communicate with each other over a network;
- Top level domain name (eg: .com, .net, .gov, .au etc);
- The type of browser and operating system you used;
- Date and time of your visit;
- The referring website;
- Which pages are accessed;
- The time spent on individual pages and the site overall;
- Which files were downloaded; and
- What keywords you used to search the site.

2. Why we collect personal information

The AAA only collects Personal Information which is necessary for, or directly relates to its functions or activities. Personal Information is collected for the primary purpose of effectively servicing the relationship established between AAA and the individual or organisation. At all times the AAA will endeavour to ensure that the collection and storage of such Personal Information is fair, lawful and unintrusive.

We collect and use Personal Information for the following purposes, without limitation:

- to provide information, products and services to you and requests information to manage and administer those products and services (including enrolment, assessment and issuing certificates of completion and testimonies);
- to respond to your queries relating to our site, our products, advice and services;
- to provide information to our network of industry partners, members and contractors (each a consultant) for the purposes of assisting you and managing your enquiry or needs;
- to better understand your needs, enabling us to improve our products and services;
- to ensure our customer/client databases and internal records are maintained;
- to circulate promotional emails about new products and services, special offers or other information which we think you may find interesting;
- offer you promotional product or market our product that you are interested in;
- to contact you for market research purposes;
- to provide you with information specific to AAA projects, promotions and products;
- where the AAA, its projects, promotions and/or products are required to comply with legislative requirements;
- to provide general information about the industry including IR changes, sector wide updates, political materials and other related information;
- individual career results;
- Inform you of career finder/job fairs;
- general information relating to careers within the sector;
- to customise the site according to your interests; and
- to customise documents according to your business needs;
- to investigate any complaints that you make;
- to investigate whether you are in breach of our terms and conditions;
- verify your identity; and
- to notify you of vacant positions if you applied for jobs with us;

AAA will also use Personal Information collected in accordance with the original purpose for establishing the relationship. For members these purposes include all activities consistent with the organisation's mission and constitutional objectives. AAA has a policy of not selling Personal Information outside of the AAA organisational structure.

We will only collect your Personal Information using fair and lawful means. If we receive unsolicited Personal Information, we may destroy it or ensure that it is de-identified if it is lawful and reasonable to do so.

If you choose not to provide Personal Information when completing one or more of these activities, you may not be able to complete that activity. If you choose not to participate in these activities, your choice will in no way affect your ability to browse these websites and online facilities.

3. Consent and use of personal information

The Personal Information you provide when interacting with the AAA is used for the purpose it was collected, including the items mentioned in clause 2 above, and where extra information is required in order to provide the service you have requested. The AAA may use your contact details to respond appropriately to your enquiry and for internal information sharing but not for the purposes of commercial gain.

Consent

You consent to this Privacy Policy once you provide us with your Personal Information.

You understand and acknowledge that the consent you are to provide when submitting Personal Information is required in order for the AAA to provide our services or to assist in our interaction with you.

Consent may be withdrawn by contacting us in accordance with clause 8 of this policy.

After having received, reviewed and actioned your request, your withdrawal of consent will be noted on our system, provided we are not required to store your Personal Information for a longer period of time.

We will use our best commercial endeavours to action your request as soon as possible. However, we note that during the time between receiving your request to processing the withdrawal your Personal Information, you will not hold use liable for the use of your Personal Data during this processing time.

4. Web analytics

AAA may use a web analytics service, including cookies, to enable analysis on usage of AAA websites and online facilities.

'Cookies' are small pieces of information that are stored by the browser on your computer's hard drive. Data collected using cookies is used for the purpose of compiling usage reports for AAA and providing other services relating to website activity and internet usage.

These reports may contain data relating to pages viewed, files downloaded or the completion of online forms or subscriptions. AAA uses the data collected by such analytics tools to improve these websites and online facilities and to help the AAA understand how people are using them.

Please note that although cookies do not generally store Personal Information, they may contain your IP address. You are however effectively anonymous to us this information cannot be linked to the Personal Information supplied.

You may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that if you do this, you may not be able to use the full functionality of these websites and online facilities. By using these websites and online facilities, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

5. How we collect personal information

The AAA's usual practice is to collect Personal Information directly from you or your authorised representative. In limited circumstances we may collect Personal Information about you from a third party (for example, an AAA staff member, employer or a publicly available source).

6. Security and how we store personal information

The AAA stores all Personal Information securely and restricts access to those employees who need access in order to perform their duties or to assist individuals. Personal Information is stored electronically such as on databases, hard drives or in emails, or on hard copy files. The AAA takes necessary steps to ensure that Personal Information is protected from misuse, loss and interference.

We use a database management system to store Personal Information received and it contains security features, such as encryption, firewall and anti-virus, to ensure the protection and integrity of all data. If accommodation is booked through the AAA credit card details are stored until the conclusion of the event. Otherwise, credit card details are submitted directly to the banking system and are not passed or retained by the AAA in any form.

7. Disclosure of personal information

We only disclose your Personal Information for purposes that are reasonably related to our business. We will not disclose your Personal Information to third parties for payment, profit or advantage.

We may disclose your Personal Information to third parties, from time to time, to assist us in conducting our Business, including:

- technology service providers including internet service providers or cloud service providers;
- couriers such as Australia Post;
- data processors that analyse our website traffic or usage for us;
- agents that perform functions on our behalf, such as mailouts, debt collection, marketing or advertising;
- our related bodies corporate; and
- to persons, entities or courts as required under the law.

We may disclose your Personal Information to third parties:

- to provide the service you wish to use;
- to improve our Business, services, products and Website;
- to customise and promote our services which may be of interest to you;
- to comply with or as permitted under the law; or
- with your consent.

We may disclose your Personal Information to entities located overseas and will use reasonable endeavours to ensure they are subject to similar privacy legislation when handling such information.

We use our every and best endeavours to ensure each third party we directly contract with, in the dealings of Personal Information, are aware of their processor liability provisions under the EU GDPR and also are aware of privacy obligations in the dealings with Personal Information.

In the event that you register to attend a AAA event, we may disclose your first name, last name and organisation as part of a delegate list to registered attendees, sponsor and exhibitors.

8. Access to Personal Information

Accessing Your Personal Information

You may request access to your Personal Information that we hold and we will:

- verify your identity;
- charge you to cover the cost of meeting your request, if any, but not for the request itself, should your application not be subject to the EU GDPR; and
- within a reasonable period of time, comply with your request.

We may refuse to allow you to access your Personal Information if we are not required to do so under the Australian Privacy Principles, therefore meaning your application is not subject to the EU GDPR.

Correcting Your Information

You may request to correct your Personal Information that we hold and we will update your Personal Information so that it is up-to-date, accurate, complete, relevant and not misleading.

How to Contact Us

If you would like to access or correct your Personal Information, please contact us by:

- email:
membership@airports.asn.au
- writing to: [Australian Airports Association Level 1, 55 Blackall Street, Barton, ACT 2604]; or
- phone: 02 6230 1110

For security reasons, and to protect individuals' privacy, applicants may be asked to provide proof of their identity.

9. Direct Marketing to you

We will not send you unsolicited commercial electronic messages in contravention of the Spam Act 2003 (Cth).

We may use the non-sensitive information you gave us for the purpose of promoting and marketing our business to you if we:

- use the information that you reasonably expected us to use for promoting and marketing our Business to you; and

- provide you a simple method to opt-out.

We will not contact you to promote or market our business if you requested us not to.

We may also disclose your Personal Information to our related entities, including our members and their related entities, so they may give you information and offers about products and services offered by them.

10. Third Party Providers

The AAA website or social media accounts may contain links to other websites or third party products of interest. Please note that we do not have any control over those websites. We are not responsible for the protection and privacy of any Personal Information which you provide whilst visiting such websites and such websites are not governed by this Privacy Policy. You should exercise caution when accessing such websites and look at the Privacy Policy applicable to the website in question.

The AAA also uses the following third party providers:

- [Facebook](#)
- [Twitter](#)
- [LinkedIn](#)
- [YouTube](#)
- [EventsAir](#)
- [MailChimp](#)

The AAA does not warrant the accuracy, reliability or timeliness of any information published by any third party sites, nor endorses any content, viewpoints, products or services on any third party sites and shall not be held liable for any losses caused by reliance on the accuracy, reliability or timeliness of such information.

It is your responsibility to verify all information provided by third party websites and online facilities and/or websites linked to or from them. Any person or entity that relies on any information obtained from a third party website does so at their own risk.

11. Breach of personal information

In the unlikely event of a breach of privacy:

- we employ practices to notify the relevant bodies under the Privacy Act 1988 (Cth) and the EU GDPR within the required timeframes.
- We will notify you without undue delay, should it be found the breach places your rights and freedoms at a high risk.

The AAA will also report data breaches to the Office of the Australian Information Commissioner (OAIC) in a timely manner.

12. Controlling your personal information

Choice and Consent: Providing us with your Personal Information is optional to you. You can choose not to provide Personal Information. When you provide us with your Personal Information, you consent to the terms in this Privacy Policy, and to us disclosing or receiving your Personal Information for these purposes.

Anonymity: We will provide individuals with the option of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making an enquiry). Generally, it is not practicable or lawful for us to deal with individuals anonymously or pseudonymously on an ongoing basis (for example, if the individual wishes to enrol in a course of study or to become a member).

Restrict: You may choose to restrict the collection or use of your Personal Information. If you have previously agreed to us using your Personal Information for direct marketing purposes, you may change your mind at any time by contacting us at membership@airports.asn.au.

Access: You may request details of Personal Information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Commonwealth).

Correction: We rely in part upon members/clients advising us when their Personal Information changes. We will respond to any request within a reasonable time and will endeavour to promptly correct any Personal Information found to be incorrect so that the Personal Information is accurate, up-to-date, complete, relevant and not misleading.

13. Complaints

If you believe we breached the Australian Privacy Principles under the Privacy Act 1988 (Cth) or a registered Australian Privacy Principles Code, or the EU GDPR, you may lodge a complaint as follows:

- firstly, contact us in writing to the email or postal address in clause 8 and include the following in your complaint:
 - your contact details;
 - section or provision of the Australian Privacy Principles or Code or the EU GDPR that you believe we breached; and
 - our practice or policy that you believe breaches the relevant Australian Privacy Principle or Code,
- and you must allow us a reasonable time, about 30 days, to reply to your complaint;

If an individual is not satisfied with the outcome of your request, a complaint can be submitted to the Office of the Australian Information Commissioner (OAIC). Further details about making a privacy complaint to the OAIC can be found [here](#).