

ACSI Privacy Policy

March 2025

We recognise the importance of privacy protection and are committed to complying with the Australian Privacy Principles contained in the *Privacy Act 1988 (the Privacy Act)* including the *Privacy and Other Legislation Amendment Act 2024 (Cth) (Amendment Act)*. These principles govern the way in which we collect, use, disclose, store, secure and dispose of your personal information. A copy of the Australian Privacy Principles may be obtained from the website of [The Office of the Australian Information Commissioner](#).

1. Type of information we collect

Personal information is information or an opinion that identifies an individual. Examples of personal information we collect include:

- Name
- Address
- Title
- Organisation (may include past employers)
- Mobile/phone contact details
- Email address
- Dietary requirements detailed on delegate registration forms
- Accommodation and flight details (where relevant)
- Biographies and headshots of speakers
- Conference feedback surveys
- Photography, video and audio taken during our training programs and events including the Annual Conference

If you provide your information anonymously, it will not be personal information.

We may also collect any other personal information that you submit to us, via our websites, including www.acsi.org.au (Website).

2. How we obtain personal information

The majority of information collected by us is received directly from you by way of:

- www.acsi.org.au or our membership portal delta.acsi.org.au
- email and phone correspondence
- digital and print business cards
- meetings, training and events, including conferences run by or in association with us
- recruitment processes and interviews
- training and event registration forms and portals
- member and delegate surveys
- your own organisational website
- media and other publications and other publicly available sources
- third parties.

It is important to us that your personal information is up to date. We will take reasonable steps to make sure that your personal information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

If we collect your personal information from third parties, it will be in situations where we understand you have provided your consent, or you would reasonably expect that your information would be provided to us.

If someone other than you provides us with personal information about you that we did not ask for, or you provide us with unsolicited personal information, we will only hold, use or disclose this information if we determine that we could have collected this information from you had we asked for it. In this circumstance we will take all reasonable steps to notify you of the collection of that information. If we could not have collected this personal information, we will lawfully de-identify or destroy that personal information.

3. Sensitive information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

4. How do we use this information?

This Privacy Policy deals with the personal information of website users, our members, job applicants, ASX company board directors and management, training and events attendees, members of the public, service providers, other third parties and key stakeholders.

We will only use your personal information for the purposes for which it was given to us, or for purposes which are directly related to the provision of our services to you, our members or for marketing purposes (refer section 5 below). We may also use your personal information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

We collect, use and exchange your information so that we can:

- communicate with and service our members and other key stakeholders
- administer our products and services, including running training and events (such as our annual conference)
- manage our relationships (including with sponsors, corporate partners and media partners)
- update our records and keep your contact details up to date
- contact you and respond to queries
- conduct and improve our business
- identify and tell you about other products or services that we think may be of interest to you.

5. Direct marketing

We may communicate directly with individuals to promote goods and services that we believe will be of interest to you. We may also use it for other purposes for which you might reasonably expect us to use that information such as forwarding direct communication on behalf of our sponsors, corporate partners and media partner on occasion. You authorise us to use any email address or other contact information you provide to use at any time for such above purposes.

You can opt out of receiving electronic communication at any time. You agree and acknowledge that even if you opt out of receiving information about future events or marketing material, we will still send you essential information that we are required to send you relating to the services we provide.

An opportunity to 'unsubscribe' is provided within any ACSI direct marketing materials when all personal information was not provided directly by the recipients.

6. Who do we exchange personal information with?

We may exchange information with third parties where this is permitted by law or for any of the purposes mentioned in section 4. Third parties may include:

- third party service providers, including commissioned research providers, proxy voting consultants, auditors, IT providers and hospitality partners.
- digital marketing and other service providers such as social media platforms, including Twitter and LinkedIn
- sponsors, corporate partners, media partners, speakers and industry partners
- technology support service providers where applicable to the service provided to you
- government and law enforcement agencies and regulators
- entities established to help identify illegal activities and prevent fraud where authorised by law.

We may also disclose your personal information to anyone authorised by you or to whom you have provided your consent (either expressly or impliedly) or where another permitted general situation applies (as defined in Section 16A of the Privacy Act).

This includes sharing our delegate list for events and training (when deemed necessary) with sponsors, corporate partners, media partners, speakers and industry partners.

If we go through a business transition, such as a merger, acquisition by another company, or a sale of all or a part of our business assets, your personal information may be among the assets transferred.

We will not disclose information that personally identifies you to any third party other than as set out in this Privacy Policy.

Third parties

ACSI uses service providers to support our information technology (IT) requirements, customer relationship management and event and training related services including billing management. All service providers are subject to the Privacy Act and a copy of each provider's Privacy Policy is available on request from our Privacy Officer (details found below in section 10).

7. How we securely store personal information

We take reasonable steps to ensure security systems are in place to protect personal information from misuse, interference, and loss and from unauthorised access, modification or disclosure. When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information. However, most of the personal information is or will be stored in client files which will be kept by us for a minimum of seven (7) years.

We keep hard-copy or electronic records securely stored on our premises and systems or offsite using trusted third parties. We have a workplace data & digital policy which outlines the requirements of staff with respect to information security and cybersecurity. We have firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses accessing our systems. You agree that you will not act in a manner that results in us collecting, using or storing information that is in breach of our obligations at law.

8. Website

Registration is not required for you to use our website www.acsi.org.au.

Our website may from time to time contain links to other websites. ACSI makes no representations or warranties regarding how user data is used on third-party servers. We don't guarantee website links or policy of authorised third parties. We recommend reviewing the privacy policy of each third-party site linked from the Website to determine their use of your personal data.

ACSI members can access an exclusive member portal called ACSI Delta (www.delta.acsi.org.au). This service is subject to the Terms of Use, available at <https://delta.acsi.org.au/>. Registration is required to use ACSI Delta. Users are given a username and create their own password.

Only minimal 'personal information' is recorded or stored on ACSI Delta. This includes the user's name, email address, employer, basic details of the usage of ACSI Delta (such as when they last logged in) and watchlists of ASX listed companies and engagement themes entered by users which enable them to access more personalised information.

We occasionally use website analytics to gain a better understanding of the needs and interests of users. The third-party service provider used is Google Analytics and they do not have access to personal information.

ACSI Delta may from time to time contain links to other websites. ACSI makes no representations or warranties regarding how user data is used on third-party servers. We don't guarantee website links or policy of authorised third parties in association with ACSI Delta. We recommend reviewing the privacy policy of each third-party site linked from ACSI Delta to determine their use of your personal data.

9. Accessing, updating and correcting your information

We do our best to ensure the personal information kept is accurate, complete and up to date.

You may access the personal information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us by making a written request to our Privacy Officer (details found below in section 10). We will respond to your request within a reasonable period of time.

ACSI will not charge any fee for your access request however in order to protect your personal information we may require identification from you before releasing the requested information.

It is important to us that your personal information is up to date. We will take reasonable steps to make sure that your personal information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

10. Making a privacy complaint

Please contact us if you wish to discuss any issues relating to our Privacy Policy.

This may include accessing, updating and correcting your information or making a complaint if you believe we have breached your privacy rights.

If you wish to make a complaint about a breach of the Privacy Act by us, you may do so using the contact details listed below. We will seek to respond to any complaint within a reasonable period of time. We may seek further information from you in order to provide a comprehensive and complete response.

Enquiries and complaints can be directed to:

The Privacy Officer

- +61 3 8677 3890
- info@acsi.org.au
- Level 15, 2 Lonsdale Street, Melbourne VIC 3000

If you do not receive a response from us within 30 days or are otherwise unsatisfied with our response, you may also make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details can be found at <https://www.oaic.gov.au/about-us/contact-us>.

11. Anonymity and pseudonymity

Where it is practical to do so, when contacting us, you have the option to either not identify yourself or to use a pseudonym. However, this will not apply if we are required or authorised under Australian law (or a court or tribunal order) to only deal with individuals who have identified themselves.

If you wish to make a complaint without identifying yourself, you can make an anonymous complaint or by using a pseudonym in writing or by phone via the contact details provided above.

12. Changes to the Privacy Policy

We will update this Privacy Policy when our information handling practices change. Updates will be publicised on our website and as otherwise as appropriate to the particular update.

Updated and approved by the CEO on 2 October 2025.

Revision Number	Date of Issue	Author(s)	Brief Description of Change
0.1	2 October 2025	Karen Griffiths	Review for Privacy and Other Legislation Amendment Act 2024 (Cth) (Amendment Act)