

Australian
Finance
Industry
Association

Privacy Policy

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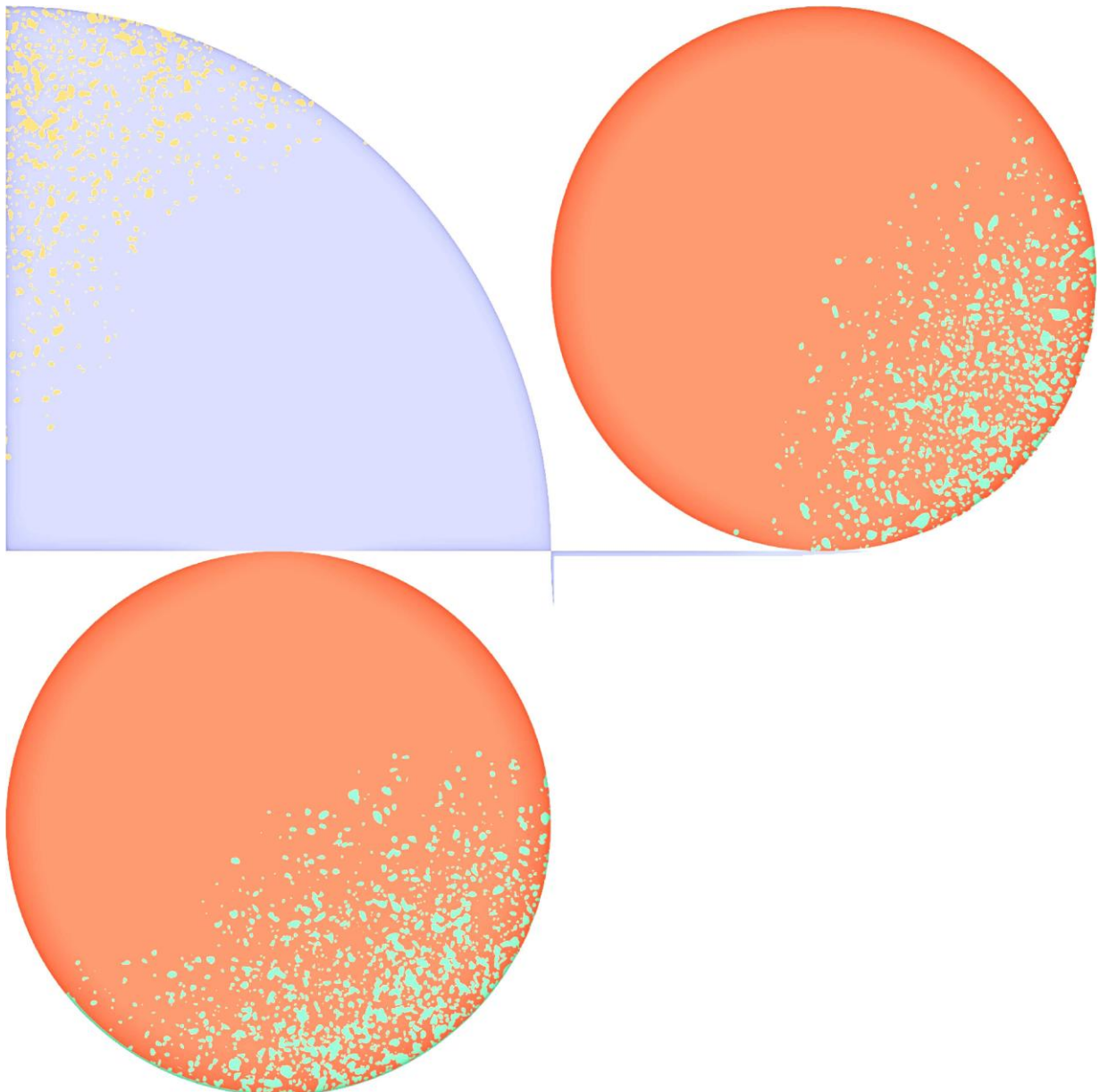


Table of Contents

About this document	3
What is 'personal information'?	3
What is 'sensitive information'?	3
Why does AFIA collect hold, use and disclose personal information?	3
What kinds of personal information does AFIA collect and hold?	6
How does AFIA collect and hold personal information?	8
When does AFIA use or disclose the personal information?	9
Does AFIA disclose personal information to overseas recipients?	10
Does AFIA use automated decision-making platforms?	10
How we hold and store your personal information	11
How can you access and/or correct your personal information that AFIA holds?	12
How do we destroy and de-identify your personal information?	12
Unsolicited personal information	13
Data breaches	13
Complaints and concerns	13

About this document

This is the privacy policy of Australian Finance Industry Association Limited ABN 13 000 493 907 (**AFIA**). In this privacy policy AFIA is also referred to collectively as 'we', 'us' or 'our'. The purpose of this privacy policy is to provide information about how we comply with the requirements of the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**). The APPs detail how personal information (including sensitive information) may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to, seek correction of or make complaints about the personal information held about them.

This policy details how AFIA manages personal information about you (including sensitive information).

In the course of doing business, we predominantly collect business-related information about individuals in their professional or representative capacity. However, in some instances we also collect personal information about individuals directly.

We review and update this Privacy Policy periodically to ensure it remains current with our information handling practices and legal obligations.

What is 'personal information'?

Personal information is defined in the Privacy Act as:

- information or an opinion about an identified individual, or an individual who is reasonably identifiable;
- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

Common examples of personal information include an individual's name, address, telephone number and date of birth.

What is 'sensitive information'?

Sensitive information is a subset of personal information and is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information, genetic information, biometric information and biometric templates.

Why does AFIA collect, hold, use and disclose personal information?

AFIA is an industry body for the Australian finance sector and we collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for our business functions or activities.

Primary purposes of collection

AFIA performs many different functions and activities. At a high level these functions and activities relate to:

- Providing services to our members;
- Undertaking research to improve our services;
- Obtaining services from other businesses;
- Employing staff;
- Codes of Practice;
- Memberships;
- Consumer Complaints;
- Industry frameworks and initiatives;
- Advocacy;
- Industry Events;
- Data Reporting / Validation / Sector Insights;
- Training;
- Social Media Management; and
- Complying with legal and regulatory obligations.

Advocacy and industry engagement

In addition, as a peak industry body, we collect and use personal information to support industry advocacy, submissions to government and regulators, stakeholder engagement and participation in working groups, committees and consultations.

We may disclose your personal information to third parties where it is reasonably necessary for them to assist us with providing our services to you, or to enable them to assist us in delivering our functions, services and activities.

Related and secondary purposes

We also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect in connection with our functions and activities. These include:

- internal administration, governance, auditing and compliance activities;

- managing and maintaining our systems, databases and records, including data backups and security processes;
- verifying your identity and managing access to our systems and portals;
- administering memberships, events, committees, working groups and industry initiatives;
- managing and responding to enquiries, submissions and complaints (including through the Car Rental Conciliation Service);
- communicating with you about industry developments, policy updates, advocacy initiatives and consultations;
- providing newsletters, event information, training materials and other relevant communications;
- conducting surveys, feedback requests and research activities;
- generating statistical, analytical and de-identified insights to support our reporting, policy development and industry engagement; and
- improving our services, systems, website functionality and user experience.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

Direct marketing

When we collect personal information from you, we may send you direct marketing material specifically tailored to the industry you operate in, the services you or your organisation have engaged us to provide, or the services you or your organisation are or may be interested in. Where we use your personal information for newsletter, marketing and educational briefing communications, you can also opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

As a member-based organisation, we may send communications that are relevant to your professional role, including industry updates, events, consultations and advocacy initiatives. You may continue to receive non-marketing communications that are necessary for the administration of your membership, participation in AFIA activities or our services.

Recruitment and employment

Where you are a prospective employee or contractor of AFIA, we collect, hold, use and disclose your personal information for purposes related to recruitment and engagement. This may include assessing your suitability for a role, conducting reference checks, communicating with you during the recruitment process and managing onboarding where applicable.

In many cases, our recruitment activities are managed by third party recruitment agencies or service providers, who may collect and provide your personal information to us on your behalf. If you are successful in your

AFIA Privacy Policy

application or engagement, your personal information may be used and retained for employment or contractor management purposes in accordance with our internal policies and legal obligations. Where we collect personal information from third parties, we rely on those parties to ensure that the information is accurate and that they are authorised to provide it to us.

Opt-out of providing personal information

If we do not collect, hold, use or disclose your personal information, or if you do not consent to the provision of such information, then we may not be able to:

- provide the full scope of our membership services, or grant you access to the full extent of our systems and portals;
- facilitate your participation in events, working groups or industry initiatives;
- respond to enquiries or complaints (including through the Car Rental Conciliation Service); or
- provide relevant updates, communications or services.

What kinds of personal information does AFIA collect and hold?

The types of personal information we collect from you or about you will depend on the transaction you have entered into with us, the services you or your organisation have engaged us to provide, and the services you or your organisation are interested in.

AFIA collects and holds personal information about the following individuals:

- individuals who are, apply to be, or were previously AFIA members
- individuals who are employed by or engage with AFIA on behalf of AFIA members
- individuals who are or apply to be employees of AFIA, and
- individuals who provide services to AFIA.

The kinds of personal information that AFIA commonly collects and holds include:

- identification and contact information (such as name, postal address, email address and telephone number);
- business and professional information (such as employer, job title, role, organisation type, professional affiliations and industry participation);
- membership-related information (including membership applications, account details, billing and payment information, and records of membership status and engagement);
- information about your participation in AFIA activities (such as committees, working groups, consultations, advocacy initiatives, events, training sessions and surveys);

- communications and correspondence with AFIA (including enquiries, submissions, feedback, consultation responses and complaints);
- information provided in connection with complaints or dispute resolution processes (including information relating to the Car Rental Conciliation Service, such as hire details, location, dates, and supporting documentation including copies of agreements, contracts, correspondence and other materials provided to us by individuals or third parties);
- event-related information (such as registration details, attendance records, dietary requirements, accessibility needs and event preferences);
- portal and system access information (such as usernames, passwords, authentication details, access permissions and activity logs relating to AFIA systems and portals);
- recruitment and employment-related information (such as resumes, work history, qualifications and referee details, where applicable);
- technical and usage information (such as IP address, browser type, device information, access logs and interaction data relating to our websites, systems and platforms);
- information about your authority to act on behalf of, or your relationship with, a member organisation; and
- any other personal information that is reasonably necessary for our functions and activities, or that you provide to us voluntarily.

Sensitive information

We may collect limited sensitive information where you have consented and the information is reasonably necessary for AFIA's functions or activities, or an exception under the Privacy Act applies. This may include:

- dietary requirements or accessibility needs to facilitate your attendance at events and functions;
- information voluntarily provided in connection with complaints or dispute resolution processes; or
- other sensitive information where you have consented to its collection.

Website and digital interactions

When you browse our website, contact us electronically or engage with us via social media, we may collect technical and usage information about your interaction with our systems and platforms. This may include your IP address, domain name, browser type, device information, the date and time of your visit, the pages you access, documents downloaded and referring websites.

While some of this information may not directly identify you, it may be combined with other information to identify individuals in certain circumstances. We use this information to administer, maintain and improve our website, systems and services, and to understand how users interact with our content. We may also use third party analytics and service providers to assist with website functionality and to analyse usage patterns.

Our website may include interactive tools such as chat functions or AI-assisted features. You should not provide

personal or sensitive information through these tools unless specifically requested, as we cannot control the information that users choose to input.

Cookies and analytics technologies

We use cookies and similar technologies to support website functionality, improve user experience and analyse website traffic. Cookies are small text files placed on your device which allow our systems to recognise your browser and remember certain preferences. You can control or disable cookies through your browser settings, however doing so may affect the functionality of some parts of our website. Where relevant, additional information about our use of cookies or tracking technologies may be provided through our website or other notices.

Interactive tools and communications

Note that our website does not have facilities for the secure transmission of emails. If you are concerned about the security of any personal information you submit by email, please contact us using an alternative method (eg telephone, secure post or encrypted message).

Our website also contains links to other websites of interest. However, once you have used those links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites, and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website/s in question.

How does AFIA collect and hold personal information?

Collection directly from individuals

AFIA aims to collect personal information directly from relevant individuals, unless it is unreasonable or impracticable for us to do so. For example, we collect personal information from you or about you:

- by telephone;
- through face to face communications;
- online (including through email and forms); and
- by hard copy correspondence and documentation.

Collection from third parties

In some instances, we may collect personal information from third parties, including:

- member organisations (about their staff and representatives);
- service providers and contractors (such as IT providers, CRM systems, survey providers and hosting providers);
- recruitment agencies;
- partners and referrers;

- publicly available sources; and
- third-party platforms such as social media or event registration systems.

We do collect photographs, audio and visual recordings at events for AFIA's promotional, reporting or industry purposes. We take reasonable steps (for example, through registration forms and event signage) to ensure that individuals are aware and informed of the occurrence of photography and videography. You may request not to be included and not to appear in photography and videography, etc, by notifying AFIA, and by removing yourself from shot.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

AFIA keeps different types of records that include personal information. These include records stored electronically on databases and also hard copy files.

We take reasonable steps to notify individuals of the collection of personal information at or before the time of collection, including through collection notices, website disclosures or direct communications.

When does AFIA use or disclose the personal information?

If AFIA collects personal information for a particular purpose, AFIA may use or disclose that personal information for that purpose.

We may disclose personal information to:

- service providers (including IT, CRM, analytics, hosting and survey providers);
- banking institutions and payment service providers (for example, to verify and process membership fees, event registration fees and other payments);
- contractors involved in delivering services (including complaint handling and conciliation services);
- event venues and suppliers (for example, to facilitate dietary or accessibility requirements);
- professional advisers (such as legal, audit or consulting providers) where reasonably necessary;
- government bodies, regulators and industry stakeholders; and
- other parties where you have consented.

We may also use or disclose personal information for other secondary purposes including the following:

- where the individual has consented to the use or disclosure for the secondary purpose

AFIA Privacy Policy

- the secondary purpose is related to (or in the case of sensitive information directly related to) the primary purpose for which the personal information was collected and the individual concerned would reasonably expect us to use or disclose the information
- the use or disclosure is required, permitted or authorised under an Australian law or a court or tribunal order
- a permitted general or health situation exists as defined in the Privacy Act, or
- we reasonably believe that the use or disclosure of the personal information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Does AFIA disclose personal information to overseas recipients?

In the course of our operations, we may disclose some of your personal information to overseas recipients. However, we will only do so where:

- it is necessary to complete the transaction you have entered into; and
- you have provided consent; or
- we believe on reasonable grounds that the overseas recipient is in a country with privacy laws or contractual protections that are comparable to the APPs, or where recipients are required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- it is otherwise permitted by law.

In addition to AFIA's systems in Australia, AFIA currently uses cloud-based systems which are provided by persons located in, and store personal information on servers located in, the USA, Canada and countries within the European Union.

We may also disclose or provide access to personal information to authorised contractors who access our systems remotely from overseas (for example, a contractor located in Greece involved in the administration of the Car Rental Conciliation Service complaint handling mechanisms).

Where we disclose personal information overseas, we take reasonable steps to ensure that the recipient does not breach the APPs.

Does AFIA use automated decision-making platforms?

AFIA does not currently use any fully or partially automated decision-making systems to make decisions that significantly affect the rights of individuals.

We do and may use aggregated and de-identified data for analytics, reporting and industry insights.

If we introduce automated decision-making processes affecting individuals in the future, we will update this Privacy Policy accordingly.

How we hold and store your personal information

Storage environments

Your personal information is primarily held and stored electronically, and in limited cases may also be held in hard copy form.

Personal information may be stored across a range of systems and environments used by AFIA, including:

- cloud-based platforms and infrastructure (both locally and overseas hosted);
- customer relationship management (CRM) systems;
- document and records management systems;
- email systems;
- collaboration tools (such as SharePoint and Teams);
- online portals (such as Perpetual) and survey platforms; and
- backup and archival systems.

Security measures

We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and unauthorised access, modification and disclosure. For example:

- data held and stored on paper is stored in secure premises with monitored alarms;
- data held and stored electronically is protected by internal and external firewalls, and all access to electronic data including databases requires password access that meets Microsoft complexity standards;
- access to personal information is restricted to staff and contractors whose job description requires access;
- data stored or archived off-site is contained within secure facilities. We also require our storage contractors to implement privacy safeguards;
- we undertake regular data backups, with the data copied and backed up to multiple locations;
- where we disclose personal information to third parties (including contractors and affiliated businesses located locally and overseas), our contractual arrangements with them include specific privacy requirements;
- our staff receive regular training on privacy procedures.

We continually review and improve our data governance, systems and practices to strengthen the security and management of personal information.

How can you access and/or correct your personal information that AFIA holds?

We take reasonable steps to ensure that the personal information we use or disclose is accurate, complete and up to date, having regard to the purpose of the use or disclosure.

You may request access to or correction of your personal information held by us, by emailing us at info@afia.asn.au. Your rights to do so are free of charge. We will provide access and/or make corrections (as relevant) where we are required to do so under law. In other cases, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. In respect of correction requests, where AFIA refuses a correction request, you may ask us to associate a statement with the information (which notes that you consider it to be incorrect). In respect of access requests, we reserve the right to recover our reasonable costs of providing you with access to your personal information held by us where legally permissible.

We may take reasonable steps to request additional information to verify your identity before providing access or making corrections. We will respond to requests within a reasonable period. We will keep you updated of our progress with your request, including if we believe we will need further time to respond.

To assist us to keep our records up to date, please notify us of any changes to your personal information at info@afia.asn.au. Mechanisms may also be available in the various platforms and portals in which you interact, to make direct updates and edits to your personal information.

How do we destroy and de-identify your personal information?

Retention of personal information

We retain personal information for as long as necessary to support and fulfil our business functions and legal obligations.

This may include:

- membership and business records (including to record attendance and engagement);
- complaint and dispute records (including those relating to the Car Rental Conciliation Service);
- financial and employment records as required by law.

We continually review and enhance our data retention and deletion practices, including by way of periodic review.

Destruction and de-identification

We take reasonable steps to securely destroy or permanently de-identify personal information when it is no longer required for our functions, legal obligations or permitted business purposes and activities.

The methods we use will depend on the nature of the information and how it is held and may include:

- secure destruction of paper records (for example, shredding or using contracted secure document destruction providers); and
- deletion, de-identification or archiving of electronic records in accordance with our records management and retention practices.

Electronic records that are retained for longer periods may be archived to secure storage environments and continue to be subject to appropriate access controls and safeguards.

Unsolicited personal information

If we receive personal information that we have not requested, we will assess whether it would have been permissible for us to collect that information. If not, we will take reasonable steps to destroy or de-identify it.

Data breaches

In Australia, if we suspect that a data breach has occurred, we will undertake an assessment into the circumstances of the suspected breach within 30 days after becoming aware of the occurrence of the suspected breach. Where it is ascertained that a breach has actually occurred and where required by law, we will notify the Privacy Commissioner and affected individuals in accordance with our legal requirements.

Under the Privacy Act and under an eligible data breach declaration, we may be asked or required to share and/or handle a limited amount of personal information to prevent or reduce the risk of harm to individuals whose personal information has been or may have been breached.

Complaints and concerns

If you have any concerns, or wish to complain about how we have handled your personal information, you should contact us at info@afia.asn.au.

We will acknowledge receipt of your complaint within 2 business days, undertake enquiries, and will endeavour to resolve it within a reasonable timeframe, taking into account the nature and complexity of the complaint. We may request additional information from you to clarify your concern or complaint, or to assist our enquiries. We will provide you with a response outlining the outcome of our enquiries.

If, after this, you are not satisfied with the outcome, you are entitled to escalate your complaint to the Office of the Australian Information Commissioner (OAIC).

You may contact the OAIC on either 1300 363 992 or their website - www.oaic.gov.au/about-us/contact-us/

We are unable to handle or assist you with a complaint involving the privacy practices of our member businesses. If you have a privacy complaint about a member, you should take up your complaint directly with the member concerned.

Version History

Version	Date	Further Description
1.0	January 2020	Amended to reflect change to AFIA structure
2.0	May 2022	Amended to reflect Privacy Legislation Amendment Act 2022
3.0	September 2026	Amended to reflect changes to Privacy and Other Legislation Amendment Act 2024