

Questions to ask yourself when defining this policy:

- Who or what is your Information Controller?
- Will your Research Community have a Information Protection Officer?
- Which information do you need to collect on the user? Is this minimised?
- Specific information collected by each service may vary. Can your Collaboration provide a template statement for all services?

*\*delete this box after completing the policy.*

## Privacy Policy

This policy is effective from <insert date>.

<b>Name of the Service</b>	SHOULD be the same as mdui:DisplayName
<b>Description of the Service</b>	SHOULD be the same as mdui:Description
<b>Information controller and a contact person</b>	You may wish to include the Information Controller defined for the Collaboration, rather than per-service
<b>Information controller's Information protection officer (if applicable)</b>	
<b>Jurisdiction and supervisory authority</b>	<p>The country in which the Service Provider is established and whose laws are applied. SHOULD be an ISO 3166 code followed by the name of the country and its subdivision if necessary for qualifying the jurisdiction.</p> <p>How to lodge a complaint to the competent Information protection authority:</p>

Policy Development Kit  
Privacy Policy

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*Policy Development Kit was reviewed by the AAF Trust and Identity Pathfinder Policy Working Group, by and for Australian national research infrastructure, enabled by NCRIS.*

	<p><i>Instructions to lodge a complaint are available at...</i> AU, Australia</p> <p>Instructions to lodge a complaint are available at The Office of the Australian Information Commissioner.</p>
<p><b>Personal information processed and the legal basis</b></p>	<p><i>A. Personal information (attributes) retrieved from your Home organisation:</i></p> <ul style="list-style-type: none"> <li>- <i>your unique user identifier (SAML persistent identifier) *</i></li> <li>- <i>your role in your Home Organisation (eduPersonAffiliation attribute) *</i></li> <li>- <i>your name *</i></li> <li>- <i>...</i></li> </ul> <p><i>B. Personal information gathered from yourself</i></p> <ul style="list-style-type: none"> <li>- <i>Logfiles on the service activity*</i></li> <li>- <i>Your profile</i></li> <li>- <i>...</i></li> </ul> <p><i>* = the personal information is necessary for providing the Service. Other personal information is processed because you have consented to it.</i></p> <p>Please make sure the list A. matches the list of requested attributes in the Service Provider's SAML 2.0 metadata.</p>
<p><b>Purpose of the processing of personal information</b></p>	<p>Don't forget to describe also the purpose of the log files, if they contain personal information (they usually do)</p>
<p><b>Third parties to whom personal information is disclosed</b></p>	<p>Personal information we collect may be transferred from AU to the USA, UK, the EU and other countries. This includes transfers to third-parties, particularly our third-party service providers.</p> <p>These countries may not provide the same level of data protection as your home country.</p> <p>We take appropriate steps to ensure that recipients of your personal information are bound to duties of confidentiality,</p>

	that we implement measures to ensure that any transferred personal information remains protected and secure in line with Data Protection Laws and otherwise comply with the provisions of relevant Data Protection Laws relating transborder data flows.
<b>How to access, rectify and delete the personal information and object to its processing</b>	<i>Contact the contact person above. To rectify the Information released by your Home Organisation, contact your Home Organisation's IT helpdesk.</i>
<b>Withdrawal of consent</b>	If personal information is processed on user consent, how can he/she withdraw it?
<b>Information portability</b>	Can the user request his/her Information be ported to another Service? How?
<b>Information retention</b>	When the user record is going to be deleted or anonymised? Remember, you cannot store user records infinitely. It is not sufficient that you promise to delete user records on request. Instead, consider defining an explicit period.  <i>Personal information is deleted on request of the user or if the user hasn't used the Service for 18 months.</i>
<b>Information Protection Code of Conduct</b>	<i>Your personal information will be protected according to the Privacy Act 1988.</i>

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