



AAF Ltd Privacy Policy

Responsible Officer	COO
Approval Date	28 September 2023
Approval Authority	CEO
Date of Next Review	Q4 2023

Purpose

This policy is intended to help you understand how the Australian Access Federation Ltd (AAF Ltd) manages personal information. Whenever you give us personal information, you are consenting to its collection and use in accordance with this policy.

AAF values and respects the privacy of the people we deal with. AAF is committed to protecting your privacy and complying with the Privacy Act 1988 (Cth) (Privacy Act) and other applicable privacy laws and regulations.

This Privacy Policy (Policy) describes how we collect, hold, use and disclose your personal information, and how we maintain the quality and security of your personal information.

The latest version will be made available on the AAF website: www.aaf.edu.au

What is personal information?

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

Your personal information and AAF Ltd

AAF Ltd operates a service to authenticate end users to access services or applications operated by Service Providers. Identity Provider Subscribers (**Identity Provider** or **Subscriber**) such as universities and educational institutions subscribe to AAF Limited, and through a combination of technology and policy, enable their end users to authenticate and access services offered by Service Provider Subscribers (**Service Provider** or **Subscriber**).

The main circumstances, in which AAF Ltd will collect, store, use or disclose personal information about you are:

- a) where you act as an account administrator or other representative of a Subscriber and your personal information is provided to AAF Ltd by you or the Subscriber; or
- b) where you are an end user of a Subscriber (such as a student, teacher or researcher of a Subscriber) and AAF Ltd provides a 'Virtual Home account' or other similar service to that Subscriber, in which case your personal information may be provided to AAF Ltd by you or the Subscriber to assist AAF Ltd to provide services to the Subscriber.

Further detail regarding the collection, storage, use or disclosure of personal information by AAF Ltd is set out below.

In most instances, personal information that is collected, stored, used and disclosed as a result of an individual being authenticated via the AAF service will be collected, stored, used and disclosed by Subscribers and Service Providers, rather than by AAF Ltd.

For information about the privacy policies and procedures of the Subscribers and Service Providers, please contact the relevant Subscriber or Service Provider.

What personal information do we collect?

AAF web servers log all requests processed from client access storing information such as your Internet Protocol (IP) address, browser type and your computer's operating system.

When you make an enquiry or join an AAF mailing list you may be asked to provide some personal information such as your name, organisation address, telephone number and email address. This enables AAF Ltd to respond to your enquiry or to provide you with information about the AAF and its activities.

AAF Ltd provides some services using federated authentication. For example, the Federation Manager and the AAF Support Desk. You may use these services if you use or administer an AAF Identity Provider or Service Provider. If you log into one of these services through federated authentication, your Identity Provider will release some information about you in the form of user attributes. This may include personal information such as your name, authorisation identifiers, and email address.

We will normally collect personal information about you either directly from you or from an AAF Identity Provider or Service Provider.

AAF Ltd holds personal information in electronic forms in secure databases accessible only by authorised staff. Personal information may also be held by AAF Ltd in hard copy. Personal information may also, in certain circumstances, be held on behalf of AAF Ltd in hard copy or electronic forms by its service providers (such as offsite document storage providers or electronic data storage providers).

Most services available via AAF federated authentication are not provided by AAF Ltd but by organisations that subscribe to the AAF. The section below titled Your Personal Information and AAF Subscribers explains more about this.

How do we use your personal information?

If you or your organisation have provided any personal information to us, this personal information is collected, held, used and disclosed by AAF Ltd for the purpose of operating a Federation (including providing federated authentication services), to help us respond to enquiries you have made, or to tell you about AAF Ltd activities and about services available via the AAF Ltd.

If you use federated authentication to access an AAF Ltd service such as the Virtual Home, Rapid Connect, Federation Manager or the AAF Support Desk, the personal information that is provided about you by your Identity Provider is collected, held, used and disclosed by AAF Ltd for the following purposes:

- to authorise your access to a service you have requested
- to record user access of our services. Records are retained in order to facilitate traceability of end users via the identity provider. This might be necessary, for example, to discontinue access to a service in the event of misuse
- to personalise the service for you
- to generate aggregated anonymised usage statistics for service development or for other purposes agreed in writing from time to time with the Identity Provider.

We will retain your personal information as long as necessary for the above purposes or to comply with relevant laws. We will not use your personal information for other purposes without your prior consent unless we are obliged to do so by law.

We take steps to ensure that all collection, processing and use of personal information is treated securely and in accordance with this policy.

How do we disclose your personal information?

If you use federated authentication to access an AAF Ltd service such as Virtual Home, Rapid Connect, Rapid IdP, Federation Manager or the AAF Support Desk, we may disclose your personal information to a Service Provider and/or Subscriber to authorise your access to the service you have requested and otherwise provide our services and operate our authentication service.

We may also disclose your personal information to third party service providers appointed by AAF Ltd, such as hosting or email service providers.

We will not otherwise disclose your personal information to any third party without your prior consent unless we are obliged to do so by law, or where we need to do so in order to carry out the operation of our services.

Some of the parties we disclose your personal information to may be located outside of Australia (for example if we disclose your personal information to a Service Provider located outside of Australia to authorise your access to the service). It is not possible to specify the countries in which these overseas recipients are likely to be located.

Cookies

AAF Discovery Service, Identity Providers and Service Providers uses cookies specifically to implement federated Single Sign-on and Session management of the application. You can reset your

browser to refuse any cookie or to alert you to when a cookie is being sent. If you refuse cookies, some pages or features may not function.

External Links

Our website or services may contain links to other websites. We are not responsible for the privacy practices or the contents of other sites.

Your personal information and AAF subscribers

Most of the time when you access a service via AAF's authentication service, that service is operated by a third-party that subscribes to the AAF (for example a Subscriber which is a Service Provider) and not by AAF Ltd. When you, as an end user, log into a service through your Identity Provider (usually your university or research organisation), your Identity Provider passes some information about you to the Service Provider in the form of user attributes.

The Service Provider uses the attributes for authorisation and for providing personalised service to you. AAF Ltd does not normally collect, store, use or disclose any personal information regarding you.

The management of your personal information in these transactions is the responsibility of your Identity Provider in releasing your attributes and the Service Provider. Where this information is incorrect you should contact your Identity Provider directly and seek their assistance. All AAF subscribers (Identity Providers and Service Providers, including those located overseas) are bound by the AAF Federation Rules (<https://aaf.edu.au/support/resources/>) which include requirements to comply with the Australian Privacy Act and any amendments. The Federation Rules include restrictions on the conditions under which user attributes may be released and used.

Your personal information and the Virtual Home

The AAF Virtual Home (VH) service is an identity management system for individuals who need to use AAF's authentication service but who do not have an account with an AAF Identity Provider. Most AAF Subscribers have their own section of the Virtual Home where they manage their users.

If you have an account on the Virtual Home, an AAF Subscriber organisation will have created the account for you to enable you to access federated services. The username and password you have been issued are for your sole use and may not be assigned or transferred. Protect your username and password with adequate care. You are personally responsible for any abuse of your authentication details. It's strongly recommended to configure multi-factor authentication within Virtual Home.

To use the Virtual Home service details including your name and email address are required. Any personal information about you that is stored in the Virtual Home may be stored on AAF Ltd's systems, however it is entered and maintained by the organisation that created the account for you, not by AAF Ltd. All such information is subject to that organisation's policy on the management of personal information. This Subscriber organisation is acting as your Identity Provider and is required to manage your information as specified in the AAF Federation Rules (see <https://aaf.edu.au/support/resources/>). If your personal information is incorrect you should contact your Identity Provider directly and seek their assistance.

By using your Virtual Home account to authenticate to a federated service, you are consenting to the organisation that created the account for you and AAF Ltd disclosing your personal information to the Service Provider. The Service Provider is bound by the AAF Federation Rules when using this information.

Other information

You have a right to request access to, and seek correction of your personal information held by AAF Ltd. You can make such a request by contacting our privacy compliance officer. Our privacy compliance officer can be contacted by post at Level 14, 167 Eagle Street, Brisbane QLD 4000 or by emailing us at enquiries@aaf.edu.au

If you believe that AAF Ltd has not dealt with your personal information in compliance with the Privacy Act and/or the Australian Privacy Principles, you should contact our privacy compliance officer using the contact details set out above. You will be required to detail your complaints in writing.

AAF Ltd will deal with privacy complaints promptly and seriously. AAF Ltd will investigate your complaint and inform you of the outcome of the complaint following the completion of the investigation.

In the event you are dissatisfied with the outcome of the complaint, you may refer your complaint to the Office of the Australian Information Commissioner.

You may opt out of our newsletters by contacting us at enquiries@aaf.edu.au or you can unsubscribe.

Version control

Version	Date	Author	Notes
1.0	14 September 2020	Elleina Filippi	Updated template, added version control
1.1	6 July 2023	Sheree Cuyten	Address changed and Federation Rules weblink updated.
1.2	7/09/2023	Elleina Filippi	Update Federation Rules link and minor updates
1.3	18/10/2023	Russell Ianniello/John Scullen	Update wording / cookie statement