

[PDK02]

# Privacy Policy

## Key questions to inform policy development:

- Who or what entity controls personal information in your Collaboration (such as a Service Provider)?
- Will the Collaboration have a nominated Privacy Officer?
- Specific information collected by each Service Provider may vary. Can your Collaboration provide a template statement for all Service Providers?

Note that at the time of publication, legislation passed in November 2024 to amend the *Privacy Act 1998* (Cth) has not yet been incorporated into the published legislation, or the website of the Office of the Australian Information Commissioner due to relevant grace periods. Refer to the *Privacy and Other Legislation Amendment Act 2024* to review the updates.<sup>‡</sup>

<sup>‡</sup>See <https://www.legislation.gov.au/C2024A00128/latest/text>

\*Delete this box and any implementation notes after completing the policy.

## 1 Introduction and Purpose

### 1.1 Objectives

This Policy contains the Privacy Policy baseline document for the Collaboration. It should be used as a template for all Service Providers offering Collaboration Services.

### 1.2 Scope

The Privacy Policy must be offered by all Services offered by the Collaboration as it pertains to the personal information of registered Users, and the processing of that information.

### 1.3 Implementation

While it is recommended that the Collaboration implement one overarching Privacy Policy, Service Providers may require a separate Privacy Policy which should comply with all Collaboration Policies. Where a conflict may arise, this Privacy Policy should take precedence as it pertains to the Collaboration.

### 1.4 Definitions

Terms are defined in the Top-Level Collaboration Policy.<sup>1</sup>

## 2 Privacy Policy

<b>Name of the Service</b>	<SHOULD be the same as mdui:DisplayName>
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<sup>1</sup> <Link to PDK01>

<b>Description of the Service</b>	<SHOULD be the same as mdui:Description>
<b>Service Provider</b>	<i>Implementation note:</i>  <i>If the Collaboration has a Chief Information Officer, this information may be included.</i>
<b>Privacy Officer</b>	<i>Implementation note:</i>  <i>List the Privacy Officer for the Service Provider. If the Collaboration has nominated a Privacy Officer, list those details.</i>
<b>Jurisdiction and supervisory authority</b>	AU, Australia  Instructions to lodge a complaint are available at The Office of the Australian Information Commissioner.  <a href="https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us">https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us</a>
<b>Personal information processed and the legal basis</b>	In accordance with s2.2.1 of the Community Membership Management Policy, <sup>2</sup> the Community Manager must operate, or have operated on the Community's behalf, a Registry that contains the Registration Data of the Community that is operated in compliance with the Sirtfi Framework. <sup>3</sup> All required Registry information must also be listed in Schedule 1 of the Policy on Processing Personal Information. <sup>4</sup>  <b>A. Personal information (attributes) retrieved from your Home Organisation:</b> <ul style="list-style-type: none"> <li>- Your unique user identifier (SAML persistent identifier) *</li> <li>- Your role in your Home Organisation (eduPersonAffiliation attribute) *</li> <li>- Your name *</li> <li>- ...</li> </ul> <b>B. Personal information gathered from yourself</b> <ul style="list-style-type: none"> <li>- Logfiles on the service activity*</li> <li>- Your profile</li> <li>- ...</li> </ul>

<sup>2</sup> <Link to PDK06>

<sup>3</sup> The *Security Incident Response Trust Framework for Federated Identity* (v2.0). Refer to [refeds.org/sirtfi](https://refeds.org/sirtfi). Sirtfi v2.0 compliance includes but is not limited to compliance with v1.0.

<sup>4</sup> <Link to PDK03>

	<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><b>Purpose of the processing of personal information</b></p>	<p><i>Implementation note:</i></p> <p><i>In addition, ensure to describe also the purpose of any log files, if they contain personal information (they usually do).</i></p>
<p><b>Automated decision-making processes</b></p>	<p><i>Implementation note:</i></p> <p><i>In 2024, Australian Government passed the Privacy and Other Legislation Amendment Act which introduced Australian Privacy Principles 1.7-1.9 ‘Automated Decisions’ (effective 10 December 2026). Familiarise yourself with these amendments and, where the provisions in APP 1.7 are met, include in this section:</i></p> <ul style="list-style-type: none"> <li><i>a) The kinds of personal information used in the operation of such computer programs</i></li> <li><i>b) The kinds of decisions made solely by the operation of computer programs; and</i></li> <li><i>c) The kinds of decisions for which a thing, that is substantially and directly related to making the decision, is done by the operation of such computer programs. [AAF note: That is, list the instances where a computer is substantially or directly assisting in making a decision].</i></li> </ul> <p><i>It is best practice to include a reason for the automated decision-making process to ensure compliance with APP 1.7 b and 1.9d.</i></p> <p><i>&lt;Example:</i></p> <p>The Collaboration in some cases uses automated decisions (computer, or computer assisted decision-making) in registering/granting/other Users access to Services. The personal information used in making these decisions and the types of automated decisions made are listed below:</p> <p><b>C. Personal information used in automated decisions</b></p> <p>- ...</p> <p><b>D. Decisions made solely by automated processes</b></p> <p>- ...</p> <p><b>E. Automated processes that support decisions</b></p> <p>- ...&gt;</p>
<p><b>Third parties to whom personal information is</b></p>	<p>Personal information we collect may be transferred from AU to &lt;the USA, UK, the EU and other countries&gt;. This includes transfers to third parties,</p>

<p><b>disclosed</b></p>	<p>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, that we implement measures to ensure that any transferred personal information remains protected and secure in line with the Australian Privacy Principles (see the <i>Privacy Act 1988</i>) and otherwise comply with the provisions of relevant data protection laws relating transborder data flows.</p> <p><i>[Include references to other relevant privacy, data protection laws and standards, such as GDPR, and ethical frameworks like FAIR and CARE, where applicable.]</i></p>
<p><b>How to access, rectify and delete the personal information and object to its processing</b></p>	<p>Contact the Privacy Officer above. To rectify the Information released by your Home Organisation (List A), contact your Home Organisation's IT helpdesk.</p>
<p><b>Withdrawal of consent</b></p>	<p><i>Implementation note:</i></p> <p><i>If personal information is processed on user consent, how can he/she withdraw it?</i></p>
<p><b>Information portability</b></p>	<p><i>Implementation note:</i></p> <p><i>Can the user request his/her Information be ported to another Service? How?</i></p>
<p><b>Information retention</b></p>	<p>Personal information is deleted on request of the user or if the user hasn't used the Service for &lt;18 months&gt;.</p>
<p><b>Information Protection Code of Conduct</b></p>	<p>Your personal information will be protected according to the <i>Privacy Act 1988</i> (Cth), &lt;etc&gt;.</p>
<p><b>Associated Documentation</b></p>	<p><b>Collaboration Policies</b></p> <ul style="list-style-type: none"> <li>• Policy on the Processing of Personal Information</li> <li>• Acceptable Use Policy</li> </ul>

	<ul style="list-style-type: none"> <li>Community Membership Management Policy</li> </ul> <p><b>Relevant Legislation, Standards &amp; Frameworks</b>  <i>[Include all legislation, standards, and frameworks relevant to the Collaboration, highlighting their alignment with Australian laws as well as applicable international standards and regulations.]</i></p> <ul style="list-style-type: none"> <li>Privacy Act (1988) (Cth) (Australian Privacy Principles)</li> <li>...</li> <li>Other relevant international standards and legislation (e.g. General Data Protection Regulation (GDPR), FAIR and CARE Principles)</li> </ul>
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## Version Control

Document Control			
Document Approved:		Date Effective:	
Last Review Date:		Next Review Date:	
Version Control			
Version	Author	Summary of Changes	Date
1.5	AAF	Review and alignment of language and legislation. Refinement of context statements. Corrected attributions. Updated disclaimer.	March 2025