



# AAF Ltd Privacy Policy

20 March 2019

## 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.

It may be necessary to update this policy from time to time. The latest version will be made available on the AAF website: [www.aaf.edu.au](http://www.aaf.edu.au)

## Your personal information and AAF Ltd.

AAF Ltd provides a framework (including policies and technologies) which assists AAF Ltd subscribers, for example Universities or other educational institutions (referred to in this policy as **Subscribers** or **Identity Providers**) and service providers registered with AAF Ltd, for example providers of online education or research services or applications (referred to in this policy as **Subscribers** or **Service Providers**) to authenticate the end users of Identity Providers who wish to access the services or applications of the Service Provider.

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

- 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' 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 such service to the Subscriber.

Further details regarding the above 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 Ltd framework 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, 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 through federated authentication. For example, the Federation Registry 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 provide us some information about you in the form of user attributes. This may include some 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, for example at its secure premises. 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).

Please note that 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 an authentication framework), 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 Registry 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 the 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.



Whenever and wherever we collect, process or use personal information, we take steps to ensure that it 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, Federation Registry 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 framework.

We may also disclose your personal information to third party service providers appointed by AAF Ltd, such a 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 successful operation of a Federation.

Some of the parties we disclose your personal information may be located overseas (for example if we disclose your personal information to a Service Provider located overseas 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

We may use cookies. You can reset your browser so as 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 the AAF Ltd framework, the service is provided not by AAF Ltd but by an organisation that subscribes to the AAF (for example a Subscriber which is a Service Provider). Within this framework, when you, as an end user, log in to 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 a better service to you as the end user and 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 that releases your attributes and the Service Provider that receives them. 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 (<http://www.aaf.edu.au/federation-rules>) 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 on the ways they may be used.

## Your personal information and the Virtual Home

The AAF Virtual Home (VH) service is an identity management system for individuals who need to access services via the AAF Ltd framework but who do not have an account with an AAF Identity Provider. Most AAF Subscriber organisations each have their own section of the VH, where they manage their own 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 username and password.

To use the VH service AAF core attribute information regarding you may be required, including name, email address, and authorisation identifiers. Any personal information about you that is stored in the Virtual Home may be stored on AAF Ltd's systems however it is placed there 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. Where this information is incorrect you should contact your Identity Provider directly and seek their assistance.

By using your VH service 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 21, 179 Turbot Street, Brisbane, QLD 4000, or by emailing us at [enquiries@aaf.edu.au](mailto: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. Generally, you will be required to put 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](mailto:enquiries@aaf.edu.au)