Privacy Policy

Responsible Officer	Chief Executive Officer
Approval Authority	Board
Approval Date	Q4 2026
Date of next review	Q4 2028

Purpose

This Privacy Policy is intended to help you understand how the Australian Access Federation Ltd ("**AAF"**) manages personal information. We collect and handle your personal information where it is reasonably necessary for our functions and activities, and in accordance with the Privacy Act 1988 (Cth) ("**Privacy Act"**) and including the Australian Privacy Principles ("**APPs"**).

AAF values and respects the privacy of the organisations and individuals we interact with. AAF is committed to protecting your privacy and complying with the Privacy Act and other relevant privacy laws and regulations.

This Privacy 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 (e.g., an online identifier, username or device information that can be linked to you).

Engaging with us anonymously or using a pseudonym

In accordance with APP, where it is lawful and practicable to do so, you have the option of dealing with us anonymously or by using a pseudonym. For example, when making a general enquiry. However, for most of AAFs services, including federated authentication, we cannot provide the service unless you (or your Subscriber) are identified, because authentication and authorisation depend on knowing who you are.

Your personal information and the AAF

AAF provides federation, identity, hosted, support, verification, ORCID Consortium, consultancy and related services to its subscribers, members and users. These services may involve AAF collecting, holding, using or disclosing personal information where reasonably necessary to provide, administer, secure and support those services.

As part of its federation services, AAF operates authentication and access services that enable end users of Identity Provider Subscribers, such as universities, research organisations and educational institutions, to access applications operated by Service Provider Subscribers. Through a combination of technology and policy, AAF supports the trusted exchange of user attributes between Identity Providers and Service Providers.

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The main circumstances, in which AAF 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 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 provides a 'Virtual Home account' or other similar service to that Subscriber, in which case your personal information may be provided to AAF by you or the Subscriber to assist AAF to provide services to the Subscriber.

Further detail regarding the collection, storage, use or disclosure of personal information by AAF 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.
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 to respond to your enquiry or to provide you with information about the AAF and its activities.

AAF 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 holds personal information in electronic forms in secure databases accessible only by authorised staff. Personal information may also be held by AAF in hard copy. Personal information may also, in certain circumstances, be held on behalf of AAF 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 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 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 activities and about services available via the AAF.

If you use federated authentication to access an AAF 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 for the following purposes:

- to authorise your access to a service you have requested

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- 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. When your personal information is no longer needed for any purpose for which it may be used or disclosed, and we are not required by law to retain it, we will take reasonable steps to destroy it or to ensure it is de-identified.

We take reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. These steps include holding information in secure environments with access restricted to authorised personnel, protecting information in transit, and regularly reviewing and testing the security of our hosted services.

How do we disclose your personal information?

If you use federated authentication to access an AAF 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, 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). AAF stores the personal information that it holds in Australia and in the United States. Where access to a Service Provider is requested by you or arranged by your Subscriber, that Service Provider may be located in any country. As that disclosure is directed by you or your Subscriber rather than arranged by AAF, it is not always practicable for AAF to specify those countries in advance.

Cookies

AAF Discovery Service, Identity Providers and Service Providers use 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.

AAF Discovery Service, Identity Providers, and Service Providers use cookies to support federated single sign-on (SSO) and to manage user sessions across applications.

A cookie is a small file that is placed on your device when you visit a website. Cookies enable websites to recognise your browser and remember certain information about your visit. This allows web applications to respond to you as an individual, for example by maintaining your session, supporting secure login, or tailoring functionality based on your preferences.

How we use cookies:

We use cookies for the following purposes:

- **Strictly necessary cookies** – to enable core functionality such as authentication, secure access to services, and session management. These cookies are required for the operation of the service and do not require consent.

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- **Analytics cookies (where used)** – to help us understand how users interact with our services and to improve performance and usability.

Consent and control:

Where non-essential cookies (such as analytics cookies) are used, we will seek your consent before placing these cookies on your device, in accordance with applicable privacy requirements.

You can manage or withdraw your consent for non-essential cookies at any time through your browser settings or any cookie preference tools that may be made available. Most web browsers automatically accept cookies, but you can modify your browser settings to decline cookies or notify you when cookies are being used.

Please note that if you disable strictly necessary cookies, some features or services, particularly those requiring authentication, may not function as intended.

Third party cookies:

We may use third-party analytics tools (such as Google Analytics) to help us understand website usage and improve our services. These providers may use cookies to collect information about how you interact with our website.

Information collected by these providers may be transferred to and stored in locations outside Australia. Further information about how these providers handle your data, including how to opt out, is available in their respective privacy policies.

International users:

AAF services may be accessed from outside Australia, including the European Economic Area (EEA). Where relevant, AAF seeks to align its practices with applicable international privacy frameworks, including the EU General Data Protection Regulation (GDPR), particularly in relation to transparency, user choice, and responsible handling of personal information.

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. 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 does not normally collect, store, use or disclose any personal information regarding you. However, where you use a service that is hosted by AAF, such as Rapid IdP or the Virtual Home, AAF does hold or process personal information about you. More information is provided in "Your personal information and Rapid IdP" and "Your personal information and the Virtual Home" sections below.

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.

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Your personal information and the Virtual Home

The AAF Virtual Home **("Virtual Home")** 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's systems, however it is entered and maintained by the organisation that created the account for you, not by AAF. 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 disclosing your personal information to the Service Provider. The Service Provider is bound by the AAF Federation Rules when using this information.

Your personal information and Rapid IdP

Rapid IdP (Rapid Identity Provider) is AAF hosted, cloud-based Identity Provider service. Where your organisation uses Rapid IdP, AAF operates and manages the Identity Provider on your organisation's behalf, including its hosting, configuration and security.

How your personal information is handled depends on how your organisation has configured Rapid IdP. In some configurations, identity information (such as your name, email address and other attributes) is stored in a database hosted by AAF. In other configurations, Rapid IdP connects to a directory or identity provider operated by your organisation (for example Microsoft Entra ID, Active Directory or another LDAP directory), and that information continues to be held by your organisation. Rapid IdP does not retain a copy of your password.

Where AAF holds or processes personal information through Rapid IdP, it does so to operate the Identity Provider, to authenticate you, and to release the attributes needed to authorise your access to federated services. Your organisation remains responsible for the personal information it manages and for the attributes it chooses to release. If your personal information is incorrect, you should contact your organisation in the first instance.

Data breaches

AAF takes reasonable steps to prevent data breaches. If a data breach occurs that is likely to result in serious harm to any individual whose personal information is involved, AAF will assess and respond to the breach in accordance with the Notifiable Data Breaches scheme under the Privacy Act, including notifying affected individuals and the Office of the Australian Information Commissioner where required to do so.

More information can be found in the AAF Notifiable Data Breach Policy.

Automated decision-making

AAF does not use automated decision-making, meaning computer programs that make, or substantially assist in making, decisions that could reasonably be expected to significantly affect your rights or interests. If this changes, we will update this policy to describe the information used and the kinds of decisions made.

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Other information

You have a right to request access to and seek correction of your personal information held by AAF. You can make such a request by contacting the AAF 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 has not dealt with your personal information in compliance with the Privacy Act and/or the APPs you should contact us by post at Level 14, 167 Eagle Street, Brisbane QLD 4000 or by emailing us at: enquiries@aaf.edu.au. You will be required to detail your complaints in writing.

AAF will deal with privacy complaints promptly and seriously. AAF 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.

If you contact AAF, join a mailing list, or otherwise engage with AAF in relation to our organisation, business or services, we may record your email address and use it to respond to you, provide the service or information requested, administer our relationship with you or your organisation, and keep you informed about relevant AAF activities and services.

You may unsubscribe from AAF newsletters or marketing communications at any time by using the unsubscribe link in our emails or by contacting enquiries@aaf.edu.au. If you unsubscribe from newsletters or marketing communications, we may still send you service, technical, support, compliance, finance or administrative communications where these are reasonably necessary for our relationship with you or your organisation.

Version control

Version	Date	Author	Notes
1.0	14/09/2020	COO	Updated template, added version control
1.1	06/07/2023	EA	Address changed and Federation Rules weblink updated.
1.2	07/09/2023	COO	Update Federation Rules link and minor updates
1.3	18/10/2023	Head of Technology / Head of Trust and Identity Strategy	Update wording / cookie statement
1.4	8/06/2026	Cybersecurity Officer / Policy Analyst	Privacy review update and, revised consent; added Rapid IdP, data breaches, automated decision-making and anonymity sections; strengthened security, retention and overseas disclosure; corrected broken email link; minor corrections.

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