

International Learning Collaborative (ILC) Privacy Policy

1. Purpose

- a. The purpose of this policy is to explain how the International Learning Collaborative (ILC) collects, holds, uses, discloses and protects individuals' personal information.

The ILC's commitment is as follows:

- i. To comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles where they apply to the ILC and, where they do not apply, to follow them as a matter of best practice, including by applying equivalent processes and thresholds when responding to data breaches.
- ii. To comply with Regulation (EU) 2016/679 – General Data Protection Regulation (EU GDPR) and the UK GDPR (being the EU GDPR as it forms part of the law of the United Kingdom by virtue of the Data Protection Act 2018 (UK) and the European Union (Withdrawal) Act 2018 (UK)) where they apply to the ILC's processing of personal information. In this policy, references to the GDPR include both the EU GDPR and the UK GDPR.

2. Scope

This policy is relevant to **any individual** who discloses **personal information** to the ILC, whether they are a part of the ILC community or any member of the public worldwide.

- i. You are not required to provide personal information to us. However, if you do not provide information that we reasonably require, we may be unable to process your membership, conference or event registration, abstract submission, enquiry or application, or provide the relevant service.
- ii. This policy applies to all members of the **ILC community** who access, use, or deal with **personal information**, or handle questions or complaints about personal information, in the course of their ILC-related activities.

3. Definitions

Personal information	means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not, or as otherwise defined by applicable data protection laws
Personal data	has the meaning given under the GDPR. References in this policy to personal information include personal data where the GDPR applies.
Sensitive information	means personal information about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, or biometric information used for automated biometric verification or identification, or as otherwise defined by applicable privacy laws.
ILC community	For the purposes of this policy, ILC community includes: 1. members of the ILC



	2. employees and exchange staff 3. contractors and consultants performing work on ILC's sites or on behalf of the ILC 4. volunteers with the ILC
we (us, our, ours)	International Learning Collaborative (ILC)
you (your, yours)	Any individual who discloses personal information to the ILC
Management Committee	The Management Committee of the ILC Inc. established under the Constitution.

4. Kinds of personal information

We might collect and hold different [personal information](#) depending upon how an individual interacts with us. For example:

- i. If you access our website, we may collect information about how you have used our website; or
- ii. If you contact us for any reason, we may collect your name, address, email address, phone number or contact details.

We may also collect information about:

- i. your demographic information
- ii. your participation in special interest groups
- iii. your organisation, position, title, employment status, professional history and reference check information
- iv. your preferences or opinions
- v. your transactions, billing and payment information, including a limited payment token made available to us by stripe
- vi. your bank account details and financial records with us
- vii. your records of donations
- viii. your photograph or video recording
- ix. the frequency of your enquiries
- x. your location
- xi. the technology you use to access our services
- xii. how and when you use our services, and
- xiii. [sensitive information](#).

5. Collecting personal information

a. We may collect [personal information](#):

- i. directly from you including when we contact you, when you contact us, when you register as a member, when you visit us or when we visit your premises, when you provide billing information or payment details through our payment processor, or authorise recurring membership payments, or when you participate in a research project, complete a survey or enter a competition, or otherwise interact with ILC
- ii. from third parties whom you have authorised to provide us with information
- iii. from third parties who provide services to us or organisations of which we are a member,
- iv. from publicly available sources, such as public web pages and published databases
- v. from audio and video recordings in public locations and other spaces identified as being subject to recording devices, or
- vi. where generated by us in the course of our business activities

- b. When you use our website, we may automatically collect technical and usage information through cookies and similar technologies. This may include your IP address, device and browser information, referring website, pages visited and the date and time of your visit.
- c. We use necessary cookies to operate our website and may use analytics or marketing cookies to understand website usage and improve our communications. Where required, we will obtain consent before using non-essential cookies. You may manage cookies through your browser or, where available, the cookie settings on our website, although disabling cookies may affect website functionality.
- d. If you provide us with personal information about another person, such as a co-author, you must be authorised to provide that information and must make the person aware of this policy.
- e. We only collect sensitive information where it is reasonably necessary for our activities and we have your consent, or where its collection is otherwise authorised or required by law. We will only use or disclose sensitive information for the purpose for which it was collected or as otherwise permitted by law.

6. Holding and securing personal information

- a. We store personal information in hard copy and digital formats, both internally and with third-party service providers. We take reasonable physical, technical and organisational measures, including secure premises and file access controls, to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure.
- b. Our primary website and member/customer database is hosted by Kinsta on Google Cloud infrastructure located in Sydney, Australia. This database includes member accounts, orders, event attendee records, CRM contacts and form submissions. Information collected through Groundhogg, The Events Calendar and Event Tickets is also stored within this database.
- c. Some personal information may be transmitted to or processed by third-party service providers outside Australia where required to provide our services. This includes recipient details and email content processed by Mailgun for email delivery, payment and billing information processed by Stripe, and invoice, customer and billing information processed by Xero. Full payment card numbers are processed by Stripe and are not stored in our database. We receive only a limited payment token from Stripe.
- d. Where we disclose personal information to overseas recipients, we take reasonable steps to ensure that they handle the information consistently with the Australian Privacy Principles, except where an exception under APP 8 applies. Our service providers and their subcontractors may process personal information in the United States and other jurisdictions in which they operate, and those locations may change from time to time. You may contact our Privacy Officer for further information. Further information about transfers from the EEA or the UK is set out in section 9.
- e. We only keep your personal information for as long as it is required for the purpose for which it was collected or as otherwise required by law. If we no longer need to hold your personal information for any reason, we will take reasonable steps to de-identify or destroy that information. These steps may vary depending on the nature of the information, the way it was collected and how it was stored.
- f. Although we take reasonable steps to protect personal information, no method of electronic transmission or storage is completely secure. The transmission of information over the internet is at your own risk.
- g. If we suspect or become aware of a data breach involving personal information, we will assess the incident and take reasonable steps to contain and remediate it. Where a breach is likely to result in serious harm to affected individuals, we will notify those individuals and the Office of the Australian Information Commissioner in accordance with the Notifiable Data Breaches scheme under the Privacy Act 1988 (Cth). Where the GDPR applies, we will also comply with the data breach notification obligations under the EU GDPR and the UK GDPR, including notifying the relevant supervisory authority, and affected individuals where required, within the applicable time limits.



7. Reasons for collecting, holding, using and disclosing personal information

a. We may collect, use and disclose [personal information](#) for a number of purposes, including:

- i. providing you with services and administering memberships, events, payments and authorised recurring membership charges
- ii. providing you with information about our services, memberships, courses, activities, events and programs
- iii. developing or refining our services, including for analysing, understanding and optimizing learning and educational outcomes
- iv. internal business and administrative purposes (such as training staff, risk management; developing and marketing products and services, undertaking planning, research and statistical analysis)
- v. providing you with marketing material and communicating with you generally
- vi. providing information to prospective, current and former members and applicants about the ILC's courses, activities and programs
- vii. better understanding your needs, including by engaging with you about membership and providing you with information about any educational, recreational or support services, resources or programs that may be of interest to you
- viii. tailoring our marketing, services, promotions, philanthropic activities, and other operations for you
- ix. member retention initiatives
- x. assessing your application for a role with us and taking references
- xi. organising external activities related to your membership
- xii. administering conferences and events, including managing registrations, abstracts, reviews, presentations and communications with authors, reviewers, presenters and attendees
- xiii. reporting to Government agencies as required by law or Government policy
- xiv. for performance review and assessment purposes
- xv. for the investigation of a complaint or allegation made by or against you
- xvi. responding to, investigating and managing inquiries, complaints, feedback and claims
- xvii. responding to legitimate inquiries from government agencies, including law enforcement agencies, upon request
- xviii. corporate governance, auditing and record keeping, or
- xix. any other reason disclosed to you at the time of collection.

b. We may:

- i. use and disclose that information, including to a third party, for any of the purposes outlined in section 7.a. This may include transferring your personal information to an overseas recipient as described in section 9.
- ii. store that information in accordance with this policy
- iii. disclose that information to ILC committee members, employees, contractors, consultants and volunteers who require it to perform their ILC-related duties
- iv. disclose that information to third parties who provide products or services to us including our accountants, auditors, lawyers, website hosting and information technology providers, CRM providers, email delivery providers, payment processors, accounting software providers, advertising and marketing providers, education providers, conference organisers, conference partners, event and ticketing providers, abstract reviewers and other service providers)
- v. provide that information to third parties as required by law and to law enforcement agencies upon receipt of an official request
- vi. publish photographs of you taken during an ILC activity for informational, marketing or promotional purposes where you have been notified and any required consent has been obtained; or
- vii. ask you from time to time to confirm that the information is accurate, up-to-date, complete and relevant.

We will not use or disclose personal information for an unrelated purpose unless you have consented or the use or disclosure is otherwise authorised or required by law.



8. Direct marketing

Where permitted by law, we may use your contact details to inform you about ILC memberships, conferences, events, programs, research activities and other initiatives that may be of interest to you. We will obtain your consent where required.

You can withdraw your consent to receiving direct marketing communications from us at any time by unsubscribing from the mailing list, by contacting us at the details at the end of this policy, or by using the opt out mechanism in our direct marketing communications.

9. GDPR – additional provisions

Where the GDPR applies to our processing of your personal information, including where we offer services to individuals located in the European Economic Area (EEA), the additional provisions in this section apply.

ILC is the data controller for the purposes of processing your personal information.

Our Privacy Officer is the contact person for GDPR-related enquiries. If ILC is required to appoint a Data Protection Officer, an EEA representative or a UK representative, their contact details will be made available in this policy.

Legal grounds for processing: We rely on the following legal grounds to process your [personal information](#):

- i. *contract performance* – we may collect and process your personal information to enter into a contract with you or to perform our obligations under a contract to which you are a party
- ii. *our legitimate interests* - where the processing is necessary for those interests and those interests do not override your rights and interests, including administering and improving our activities, conducting research, communicating with members and protecting our systems
- iii. *with your consent* – where required, we will only use your personal information for the purposes for which you have given your valid or explicit consent. For instance, we may rely on consent to collect and use your [sensitive information](#) or to send you direct marketing where consent is required, and
- iv. *to comply with laws that apply to us including exercising our rights* – we may use and process your personal information where we are legally required to do so.

Transfer of information outside the EEA or UK: We may transfer personal information from the EEA or the UK to Australia and other countries in which our service providers, conference partners or other recipients operate. Where required by the EU GDPR or the UK GDPR, we will rely on:

- i. an adequacy decision issued by the European Commission or, for transfers from the UK, adequacy regulations made by the UK Government
- ii. approved Standard Contractual Clauses or, for transfers from the UK, the UK International Data Transfer Agreement or Addendum, or another appropriate safeguard, or
- iii. another lawful transfer mechanism or derogation permitted by the GDPR.

You may contact our Privacy Officer for further information about the safeguards applying to an overseas transfer.

- iv. **Time we retain your personal information for:** We retain your personal information only for as long as reasonably necessary for the purpose for which it was collected, including administering memberships, conferences, events and submissions, complying with legal obligations, resolving disputes and maintaining required records. When information is no longer required, we will take reasonable steps to delete or de-identify it.

- v. **Your additional rights and choices:** Where the GDPR applies, you may have the right to:
1. access your personal information;
 2. request correction of inaccurate or incomplete information;
 3. request deletion of your information;
 4. restrict or object to processing;
 5. withdraw consent at any time, without affecting processing undertaken before withdrawal;
 6. receive certain information in a structured, commonly used and machine-readable format;
 7. not be subject to a decision based solely on automated processing that produces legal or similarly significant effects; and
 8. complain to the relevant data protection supervisory authority.
- vi. If we refuse any request you make in relation to your personal information rights, we will write to you to explain why and how you can make a complaint about our decision.

10. Accessing or correcting personal information

- a) In most cases you can gain access to your [personal information](#) held by us.
- b) You may request access or correction to the personal information that we hold about you by contacting admin@ilccare.org
- c) We will respond to your request within 30 days or within any other period required by applicable law.
- d) We will not charge you for making a request. We may charge reasonable administrative costs only where permitted by applicable law and will notify you before any charge is incurred.
- e) If we deny your access or correction request, we will provide you with reasons.
- f) If we refuse to correct your personal information, you can ask us to attach a statement to it stating that you believe the information is incorrect and why.

11. Questions or complaints

The ILC Privacy Officer is responsible for promoting awareness of this policy and for ensuring we comply with this policy and any applicable laws about the protection of personal information.

If you have a question or complaint about how we have handled your personal information, you can raise it with us at any time by:

- i. e-mailing admin@ilccare.org
- ii. writing to us via post to: Privacy Officer

ILC Inc.
43 Margaret Ave
NORTH BRIGHTON SA 5048

We take all questions and complaints seriously and will acknowledge receipt of your question or complaint, in writing, within 10 working days and will investigate and respond to you within 30 days.

If you aren't satisfied with the way we have handled your matter, you may request a review by the ILC Management Committee. If you remain dissatisfied, you may contact the Office of the Australian Information Commissioner where the Privacy Act applies. Where the EU GDPR applies, you may also lodge a complaint with the relevant European data protection supervisory authority, and where the UK GDPR applies, with the UK Information Commissioner's Office (ICO).

12. Changes to this policy

This policy is current as at the Approval Date shown below. It may be amended in light of new laws and technology, changes to our operations and practices, and changes in the business environment. The most up to date version of this policy is always posted on our website.

Approval Date: 1st October 2026