

## Northside Adventure Gamers Association Inc.

PO Box 222,  
Narangba, QLD 4504  
0400 530 012



# Information & Privacy Policy

Version 1.0 - Published

6th March 2024

## PURPOSE

This Information & Privacy Policy (IPP) documented is intended to meet the following needs:

- i) To provide a policy framework for Northside Adventure Gamers Association Inc. (NAGA), regarding the collection, retention, dissemination & destruction of Personally Identifiable Information (PII) provided by members, ticketed event attendees and any other member of the public with whom NAGA may have dealings, in order to inform related subordinate procedures.
- ii) To outline a baseline process of transparency and accountability, to which NAGA will adhere with regard to handling PII collected in the process of its operations, as well as interactions and agreements with sponsors, partners and relevant government bodies.
- iii) To ensure any member of the public who seeks to petition for membership of NAGA is informed to the greatest extent possible, of the reasons for the collection of their PII, how that data will inform NAGA operations, and the

## LEGISLATIVE & POLICY SUPPORTING FRAMEWORK

The NAGA IPP is informed by and subordinate to the following legislation:

- *Privacy Act 1988* (CTH), including
- The Australian Privacy Principles
- *Privacy Information Act 2009* (QLD)
- *Associations Incorporation Act 1981* (QLD)
- *Associations Incorporation Regulation 199* (QLD)
- ISO/IEC 27001

In addition to the above legislation, the IPP is also informed by the NAGA Charter & Framework. While this policy strives to maintain adherence to the above documents as closely as possible,

any case in which it is seen to deviate from relevant legislation, the latter is to be taken as correct, without reservation. NAGA is held to be legally responsible for information privacy to the extent of relevant legislation. NAGA is considered to be financially liable for damages relating to matters of information privacy only to the extent relevant regulatory bodies or court decisions deem so.

## **REASONS FOR PII COLLECTION**

Section 7.5 of The NAGA Charter & Framework states that all members are required to register and provide PII. It outlines that NAGA collects this information to:

- Meet the needs of association members
  - In order to ensure that NAGA is able to meet its stated goals and adhere to its guiding principles, NAGA collects PII such as the preferred pronouns and name of its members. By being well informed about our members in this way, we are able to communicate in a personalised & inclusive manner.
- Meet the needs of the association
  - In order to provide the best service to its members, NAGA collects PII such as members' residential addresses. This information is used to inform organisational decisions such as choice of venue location, or the best area to seek external partners in expanding association services provided to members.
- Meet legislative and/or insurance liability obligations
  - As an incorporated, not for profit association, NAGA is required to meet certain statutory & regulatory obligations with regard to record keeping & information dissemination. For example, the *Queensland Associations Incorporation Regulation 1999* requires NAGA to keep, among other records, a register of members, as well as minutes of both general & committee meetings.

## **INFORMATION COLLECTION**

NAGA will seek to only collect the minimum of PII required to carry out its operations in service of its members and event attendees. Collection of PII by NAGA will only be carried out by an appropriate officer, as defined by the NAGA Charter & Framework, or as delegated by the management committee in order to ensure the efficacious operation of association activities.

Where an individual, whether acting as an appropriate officer, or as delegated by committee definition, is required to collect PII, NAGA will provide appropriate training to said individual, in order to ensure they are aware of their obligations in handling PII.

## **INFORMATION RETENTION**

To the greatest extent possible, all information collected by NAGA in the execution of its services and organisational obligations, will be anonymised or pseudonymised. This process is intended to reduce the likelihood any individual piece of data held by NAGA is able to reveal the identity of a related individual. For example, when designing and deploying electronic database storage, individual pieces of data, such as names, addresses etc. are stored in a manner that keeps data categories discrete.. What this means is that if a single database table is subject to unintentional or unauthorised disclosure - a list of residential addresses for example - the names, email addresses or phone numbers relating to those addresses will not be immediately identifiable.

All information collected by NAGA will be transferred, as soon as possible, to electronic data storage. At the time of conversion to electronic format, all paper-based PII collected, that is not subject to legislative record-keeping requirements, will be destroyed according to information security best practice - i.e destroyed by incineration or cross-cut shredding. All methods of information retention will adhere, as closely as possible, to ISO 27001. All electronic data stores will be protected by password, and to the extent possible, be maintained and updated to reduce the incidence of unauthorised access.

Access to PII stored by NAGA will be restricted to management committee members, and may only be altered by the President, Vice-President, Treasurer, or Secretary, as defined by the NAGA Charter & Framework.

## **USE OF PII**

All PII retained by NAGA is intended for internal use only, except where expressly defined within this document, relative organisational policy, or relevant legislation. NAGA will, to the greatest extent possible, provide transparency to members, as to how PII has informed operational processes. These disclosures will be made with consideration to the sensitivity of the information, whether through public communication - e.g. Association Newsletter, or communications available only to current members - e.g. Financial Documentation & Meeting Minutes.

## **INFORMATION DISCLOSURE**

PII collected and retained by NAGA is intended for the purposes outlined in this document. NAGA will not disseminate any collected and retained PII to any other individual or organisation, except when required to comply with relevant legislation, court order or law enforcement activities. Where legally and logistically possible, should NAGA be required to comply with any of the

mentioned, the committee will strive to inform any individuals of the terms and content of information provided.

At no time, and for no purpose, whether financial gain or otherwise, will NAGA disclose any PII to any other organisation or individual with which the association or its members may have occasion to have dealings. In the circumstance where NAGA, the management committee, or appropriately delegated officers find it necessary to disclose personal information to a third party, NAGA will take all actions possible to obtain express consent from relative members. In the case of a temporally sensitive disclosure, in the event of all other avenues being exhausted, implied consent will be considered to have been given. For example, if a member has financially committed to an event - such as a group excursion to a gaming convention - and is unable to be contacted to give consent for their PII to be given for ticketing information, the individual is considered to have consented by their financial contribution to the ticket cost.

## **INFORMATION DESTRUCTION**

PII that is no longer relevant to the contemporaneous operations of the association will be destroyed with adherence, to the extent possible at the time, to relative international standards. In the case where legislative, regulatory or insurance concerns dictate the retention of information over time, all records will be destroyed as soon as possible after expiration of the requisite time.

## **DELEGATION OF RESPONSIBILITY**

In the circumstance where it is deemed necessary, either by decision of the management committee, or by motion at a general meeting, the association may delegate responsibility for the collection, retention and administration of PII to a nominated delegate. Should this be the case, the following process will be undertaken:

1. The decision to delegate responsibility will be communicated as soon as possible to all members, as well as the means by which the decision was authorised and the reasons justifying the need for such a delegation.
2. Members will be afforded due opportunity to raise objections and have them considered by a meeting of the management committee.
3. Any member nominated to fill the delegated role will be provided with training and information on their responsibilities and obligations relating to PII.
4. Any PII handling will be subject to review by a member of the management committee, nominated at time of decision. If the committee does not delegate a member in any case, for whatever reason, it is the responsibility of the Secretary to ensure review is undertaken.

## **BREACH OF INFORMATION PRIVACY**

In the event that a breach of this policy is brought to the attention of the management committee, the following steps are to be undertaken:

1. Any individual members that are deemed to be affected by the breach will be contacted, as a matter of priority, by a delegated member of the management committee and provided with all details available at the time. Any updates to available information will be communicated with similar priority as it becomes available to the association.
2. The management committee will inform all members, via electronic communication, of the breach, including broad details as deemed appropriate to allow all members to make decisions to protect their privacy.
3. The Secretary, or delegated committee member, will inform any relevant regulatory or law enforcement agency of the breach and comply with any on-going requirements in the event of an investigation or external audit.
4. A delegated committee member will review insurance documentation and provide relevant insurers with information where appropriate.
5. The President, or Vice-President will work with the Secretary to investigate the circumstances of the breach and provide a report to the management committee, including recommendations for remedy of the situation, as soon as this investigation is completed. This may include review of member behaviour under the code of conduct where relevant.
6. The management committee will review the report and recommendations and implement any update or adaptation of procedure or system as deemed necessary to reduce the likelihood of the breach reoccurring.
7. The review and decisions of the committee will be communicated to members and opened to comment at the next scheduled general meeting.
8. All improvements to processes and systems will be subject to continual review at committee meetings until such time as it is deemed all necessary changes have been successfully implemented
9. All relevant information relating to the incident will be collated and stored for organisational reference.

## **POLICY REVIEW**

This document is subject to acceptance by a meeting of the management committee, following review and comment by committee members. Once the final document is accepted by the management committee, it is held to be in force for twelve (12) months from date of publication, at which time it is subject to review by the management committee. Committee review will proceed following requests for comment from members, open for a period of fourteen (14) days prior. Where possible, the review process should occur prior to the date of expiration.

The published version of this document is considered to be in force at any particular time until a reviewed document is published and supersedes the previous version.

Any member may, at a general meeting, move a motion requesting review of any part of this document. The management committee are obliged to hear the case for review and if the motion should be carried, undertake review and present the results at the next scheduled general meeting.