



Associated Advertising & Promotions Pty Ltd (AA&P) T/as AA&P Events & PR

ABN 13 085 798 750

## PRIVACY POLICY

### 1. WHERE CAN THIS PRIVACY POLICY BE FOUND?

This Policy is located on Our website and can be accessed at:

<http://www.aapeventspr.com/privacypolicy>

We will make a copy of this policy available to anyone, on request.

### 2. INTRODUCTION; APPLICATION OF PRIVACY LAWS

AA&P understands that privacy is an important issue for individuals. We are committed to complying with the Privacy Act 1988 (Cth) (the Act) and the Australian Privacy Principles (APPs). The privacy landscape in Australia has changed significantly following the Privacy and Other Legislation Amendment Act 2024 (Cth) (POLA), which received Royal Assent on 10 December 2024. We have updated this Privacy Policy to reflect those changes and to set out Our policies and procedures for handling Personal Information.

While AA&P has historically qualified as a small business under the Act, we have elected to comply with the Act and the APPs as a matter of good practice, and in anticipation of further reforms that are expected to remove the small business exemption entirely.

In cases where We collect information about an individual within the European Union, the GDPR may apply. This Privacy Policy aims to comply with both the Act and the GDPR, where the GDPR is applicable.

We aim to continuously improve Our management of privacy and this Policy may change over time. We will update the 'Last Updated' date at the bottom of this Policy whenever it is revised.

### 3. SOME IMPORTANT EXPRESSIONS DEFINED

In this Policy, the following words and expressions have the following respective meanings:

**AA&P** means Associated Advertising & Promotions Pty Ltd (ABN 13 085 798 750). References to 'We', 'Our' and 'Us' are references to AA&P.

**Act** means the Privacy Act 1988 (Cth), as amended from time to time, including by the Privacy and Other Legislation Amendment Act 2024 (Cth).

**Events Business** means that part of Our business in which We provide conference and other event management services for Our clients.

**GDPR** means the European Union General Data Protection Regulation.

**Personal Information** means information which identifies (or can reasonably be used to identify) an individual and includes 'personal data' as defined in the GDPR.

**POLA** means the Privacy and Other Legislation Amendment Act 2024 (Cth).

**Privacy Principle** means an 'Australian Privacy Principle', as set out in the Act.

**Public Relations Business** means that part of Our business that provides public relations and communications services to Our clients.

**Sensitive Information** includes Personal Information concerning (or that implies) an individual's health status, illness or disability, philosophical, religious or ethnic background, or membership of a professional or trade association.

#### **4. ACCOUNTABILITY**

It is the responsibility of all AA&P staff to comply with privacy laws and this Policy. We will conduct periodic training for Our staff, and privacy training will be included in the induction of all new staff.

#### **5. CONSENT AND OUR APPROACH TO IT**

Under the updated Act, consent must be voluntary, informed, current, specific, and unambiguous. We will not use pre-ticked boxes, vague wording, or bundled consent. We will clearly explain what individuals are consenting to before seeking their consent. We will not put undue pressure on any individual to give consent. Where consent is the basis for Our collection or use of Personal Information, individuals have the right to withdraw that consent at any time by contacting Us.

#### **6. WHAT KINDS OF PERSONAL INFORMATION DO WE NORMALLY COLLECT? HOW AND FOR WHAT PURPOSES DO WE COLLECT IT?**

The kinds of Personal Information We collect, the way We collect it and Our purposes for doing so depend on the nature of Our interaction with the individual. The individuals from/about whom We collect information fall into the following main categories:

- clients or staff of clients who may be acquiring or proposing to acquire Our services, including from both Our Event Management and Public Relations Businesses;
- individuals who attend the conferences and other events that We manage for Our clients;
- sponsors and exhibitors, media and other stakeholders who support and participate in the conferences and events that We manage; and
- suppliers of goods and services to Us and Our clients, such as but not limited to, venues, accommodation suppliers, and travel and tour providers.

#### **What information do We collect?**

##### **For Our Public Relations Business**

We usually collect names, addresses, phone numbers and email details of staff members of Our clients, external suppliers and other parties with an interest in Our consultation services. If Our client is a sole trader or partnership, We may also collect credit card and bank account details for billing purposes.

##### **For Our Events Business**

We usually collect names, addresses, phone numbers and email details of Our clients' staff, event participants (including delegates, sponsors, exhibitors, media representatives and others), and any external suppliers with whom We interact.

If We are engaged to make bookings for travel and accommodation, We will collect Personal Information that may include Sensitive Information and passport details where required for international travel or visa applications.

We may collect credit card information if that is the means by which an individual is to pay Us or Our client. Payments made to Us by credit card are subject to Payment Card Industry (PCI) security protocols and We do not retain or store credit card details.

We may also collect Sensitive Information in the following circumstances:

- health information, where relevant to: the supply of food and beverage to individuals with special dietary needs; access to and egress from venues and facilities; travel, accommodation and visa arrangements; and the prevention of the spread of disease;
- information concerning an individual's religious, ethnic or philosophical background, where relevant to food and beverage or other cultural aspects of an event; and
- where We manage a conference for a trade or professional association, information pertaining to an individual's membership of that association.

## **Purposes and use of collection of Personal Information**

### **For Our Public Relations Business**

Generally, We collect Personal Information so that We can interact with individuals and/or their business and provide professional public relations services for Our client.

### **For Our Events Business**

Generally, We collect Personal Information to manage Our commercial relationships with clients, suppliers, conference delegates and other attendees and participants such as sponsors and exhibitors. This enables Us to accept payments, allow admission to and participation in conferences and other events, and manage the delivery of goods and services to individuals during events.

We also collect and retain Personal Information so We can let individuals know of relevant news about Our current and future events and activities that may be of interest to them.

Where We collect Sensitive Information, it is usually for the purpose of arranging the supply of culturally sensitive or health-sensitive goods and services, ensuring appropriate access to and egress from venues, managing health issues, and helping prevent the spread of disease. In some instances We may be required by law or public health order to collect and disclose health information to health authorities.

### **Marketing**

We may retain Your Personal Information and send You information (including by electronic means) about events hosted by Our clients that We consider You may be interested in. You have the right at any time to ask that We stop contacting You for marketing purposes. We will comply with any such request promptly.

### **Automated Decision-Making**

From 10 December 2026, businesses subject to the Act will be required to disclose in their privacy policies where they use automated processes that make or assist in making decisions that significantly affect individuals. We will update this Policy before that date to address any automated decision-making obligations that apply to Our operations.

## **How do We collect Personal Information?**

### **Our Public Relations Business**

We usually collect Personal Information about individuals directly from the individual, by phone or email, in person, through online platforms and surveys, or directly from Our client. We sometimes collect Personal Information from a work colleague of the individual.

## **Our Events Business**

In the case of attendees at conferences and events We manage, We usually collect Personal Information directly from attendees, from Our client, or from an external or contracted supplier of conference registration services. Such information is usually provided by electronic means such as email or by attendees submitting online registration forms via the event websites We manage.

We may also collect Personal Information from Our client if they provide Us with contact information of their members or persons who have participated in previous events they have hosted.

### **7. HOW DO WE HOLD THE PERSONAL INFORMATION WE COLLECT?**

We hold the Personal Information We collect in a variety of ways, including on Our electronic (computer) database (which may be stored in the cloud) and, in some cases, on file in hard copy. We have adopted various security measures to protect this information from unauthorised access (see Section 11).

### **8. WILL WE DISCLOSE PERSONAL INFORMATION TO OTHERS?**

#### **Our Public Relations Business**

We will only disclose Personal Information collected by Our Public Relations Business where it is reasonably expected by the individual and reasonably necessary for the performance of Our services. In all other circumstances We will obtain the consent of the individual before disclosure.

#### **Our Events Business**

When We manage a conference or event for a client, We usually do so as agent for and on behalf of Our client. Accordingly, We will usually provide Personal Information collected in the course of managing their conferences and events to Our clients.

If an individual is attending a conference or event We are managing, We usually disclose that person's Personal Information to sponsors of, and exhibitors at, that event.

We may use online platforms such as 'Events Air' to assist with registration and other aspects of event management. Personal Information collected from individuals may be entered and stored on those platforms, and platform providers may have access to that information in limited circumstances such as where We have requested technical support.

We will also disclose Personal Information to third parties as the individual would reasonably expect in the provision of Our services, including to suppliers of goods or services at events where relevant Sensitive Information must be disclosed to ensure appropriate service delivery.

We may engage third parties to assist with the development, maintenance or hosting of conference and event websites, databases and other information technology. Those suppliers may have access to Personal Information We collect, and We will, wherever commercially possible and reasonable, require those suppliers to comply with privacy laws.

In the case of health information related to communicable disease such as COVID-19, We will disclose it to public health authorities where We are required to do so under law, public health order or regulation, or where required to comply with work health and safety obligations or a duty of care.

#### **Additional disclosure applicable to both Our Public Relations and Events Businesses**

We may from time to time outsource management of certain functions such as website and database management, reporting, marketing, bookkeeping and accounting. In such cases the external service provider may have access to Personal Information that We have collected, and We will include provisions in the contract that require the service provider to maintain confidentiality and comply with applicable privacy laws.

We may also disclose Personal Information to Our professional advisers, such as lawyers and accountants, where We need to seek advice.

Apart from disclosure to third parties as outlined above, We will not otherwise disclose an individual's Personal Information unless:

- We have the individual's consent;
- making the disclosure is related (in the case of Sensitive Information, directly related) to the primary purpose for which We have collected the information and We deem that the individual would reasonably have expected Us to make the disclosure;
- We are required to do so by law, in which case We would inform the individual, unless doing so itself is unlawful or would impede or defeat the purpose of the disclosure;
- in the case of Our Events Business, We are required to hand over Our management of a conference or event to another professional conference organiser or event manager; or
- We are negotiating a sale of Our business or a substantial part of it, in which case We will disclose the information only if the other party agrees to refrain from using the information until the purchase is completed.

We will never sell an individual's Personal Information unless We have the individual's express consent, or the sale is part of a sale of Our business or part of Our business as noted above.

## **9. OVERSEAS DISCLOSURE**

In some instances, We may deal with an overseas client or provide services in respect of an event taking place overseas. If We need to disclose Personal Information to any person overseas, We will not do so unless:

- We are satisfied that the overseas country has been designated by the Australian Government as providing equivalent privacy protections to those under the Act; or
- We are satisfied that privacy laws in the overseas country provide similar protection for the privacy of the individual as applies in Australia under the Act; or
- We obtain the consent of the individual.

## **10. ON-LINE PRIVACY AND COOKIES**

Our collection and management of Personal Information via Our website is set out in the Website Privacy Statement on Our website at: [www.aapeventspr.com.au](http://www.aapeventspr.com.au)

## **11. SECURITY OF PERSONAL INFORMATION**

It is not appropriate in this Policy to provide specific details of security measures We have adopted to protect the privacy of Personal Information We hold, as doing so could compromise those measures.

To exclude unauthorised persons or intruders from gaining access to the Personal Information We hold, We will use an appropriate combination of:

- physical barriers including locked doors;
- CCTV security cameras;
- access technology, password systems and encryption where appropriate; and
- administrative and behavioural protocols for Our staff.

We have acquired and will continue to acquire and maintain (reasonably within Our means) computer technology and other appropriate technology, such as password security protocols and firewalls, to prevent or retard unauthorised access into Our computer system. No security system is, however, 100% secure and We cannot guarantee that unauthorised access will never occur.

If We are the victim of a cyber-attack or other unauthorised access to Personal Information occurs, We will:

- make all reasonable endeavours to minimise the harm caused to the privacy of individuals' Personal Information and to prevent similar, further unauthorised incursions; and
- comply with applicable data-breach notification rules under the Act and the Notifiable Data Breaches scheme, including notifying affected individuals and the Office of the Australian Information Commissioner (OAIC) where required.

## **12. ACCESS, CORRECTION AND DELETION RIGHTS**

We will provide individuals access to the Personal Information which We hold about them, unless the Act would allow Us to deny access in the particular circumstances.

Some circumstances where access may be denied include where:

- providing access would unreasonably be to the detriment of the privacy of another individual;
- the request is frivolous or vexatious;
- the requested information relates to existing or anticipated legal proceedings between Us and the individual;
- giving access would reveal Our intentions in relation to negotiations with the individual and prejudice those negotiations; or
- providing access would be unlawful or if denying access is required or authorised under law.

This is not an exhaustive list of circumstances where We may deny access. When an individual requests access to Personal Information, We require a written request to be sent to Us at the address noted in Section 16. We will acknowledge the access request within 14 days and deal with it within 30 days or earlier. We will not charge a fee for providing access.

### **Right to Deletion**

Individuals may request that We delete their Personal Information in the following circumstances:

- the information is no longer necessary for the purpose for which it was collected;
- the individual has withdrawn their consent and there is no other lawful basis for retaining the information; or
- the information was unlawfully collected.

We will acknowledge a deletion request within 14 days and respond within 30 days. In some cases We may be unable to delete information, for example where We are required to retain it by law or for legitimate business purposes, and We will explain this to the individual.

### **Correction**

If an individual believes that Personal Information We hold about them is inaccurate, incomplete or out of date, they may request a correction. We will take reasonable steps to correct the information or, if We do not agree it is incorrect, to note the individual's view alongside the information We hold.

## **13. STATUTORY TORT FOR SERIOUS INVASIONS OF PRIVACY**

From 10 June 2025, individuals in Australia have the right to bring a legal action for serious invasions of privacy where the conduct was intentional or reckless. AA&P is committed to handling Personal Information with care and in accordance with this Policy.

## **14. GDPR RIGHTS**

If the GDPR applies to Our collection of Your Personal Information (for example, because You are located in the European Union), We will usually be a 'data processor' for its purposes. In that case, You have the following rights under the GDPR:

- The right to access: You have the right to request copies of Your Personal Information.
- The right to rectification: You have the right to request that We correct any information You believe is inaccurate or complete information that is incomplete.
- The right to erasure: You have the right to request that We erase Your Personal Information, under certain conditions.
- The right to restrict processing: You have the right to request that We restrict the processing of Your Personal Information, under certain conditions.
- The right to object to processing: You have the right to object to Our processing of Your Personal Information, under certain conditions.
- The right to data portability: You have the right to request that We transfer the Personal Information We hold to another organisation, or directly to You, under certain conditions.

If You make a request under the GDPR, You must tell Us that the GDPR is the basis of Your request. We will respond to You within one calendar month. Please contact Us at:  
natalie@associatedadvertising.com.au

## **15. USE OF GOVERNMENT IDENTIFIERS**

We will not use government identifiers such as tax file numbers or Medicare numbers as a means of identifying an individual.

## **16. ANONYMITY**

Given the personal nature of Our services, it is not normally appropriate for individuals to remain anonymous in their dealings with Us. If We conduct a survey, We will, wherever possible, give the individual the option of remaining anonymous unless anonymity would defeat the purpose of the survey.

## **17. CONTACTING US AND COMPLAINTS**

If an individual:

- has an enquiry about Our management of Personal Information or privacy procedures;
- wishes to request access to, correction of, or deletion of Personal Information;
- wishes to see a copy of this Policy document; or
- wishes to make a complaint about Our handling of Personal Information,

that individual can contact Us by the following means:

Email: natalie@associatedadvertising.com.au

Postal Address: The Privacy and Data Protection Officer, AA&P, GPO Box 4475, Darwin NT 0801.

## **18. COMPLAINTS PROCEDURE**

Complaints about privacy must be made in writing, addressed to Us as provided in Section 17 of this Policy. This will allow Us to deal with complaints in a professional, sensitive and consistent manner.

We will acknowledge receipt of a complaint within 30 days of receiving it and We will respond within a further 30 days of that acknowledgement. We will make reasonable endeavours to deal with the complaint within that time. We will notify the individual if We consider it is likely to take substantially longer.

If We consider that a complaint is bona fide, the complainant will be given an opportunity to propose a remedy and to discuss the matter with Us. After consideration of the complaint and consultation with the individual, We will notify them what is to be done, if anything, to redress the complaint.

We will assess whether the complaint demonstrates a systemic problem and will determine how We can address or rectify such issues so they do not recur.

If an individual is not satisfied with Our response to a complaint, they may refer their complaint to the Office of the Australian Information Commissioner (OAIC) at [www.oaic.gov.au](http://www.oaic.gov.au) or by calling 1300 363 992.

**Natalie Bell**

Managing Director

Associated Advertising & Promotions Pty Ltd

*Last reviewed: May 2026*