



# PRIVACY POLICY

July 2021

## 1. About this Policy

- 1.1 This Privacy Policy (**Policy**) sets out the information handling practices of the Independent Directors Association in Papua New Guinea Incorporated (**IDAPNG**). It does not cover personal information about our employees (which includes all past and present employees, but excludes applicants for a position with us, contractors and consultants, which are covered by this Policy).
- 1.2 Personal information refers to information or an opinion about an identified or reasonably identifiable individual, regardless of whether it is recorded in material form or whether it is true or false. Sensitive information is a sub-category of personal information and includes details about race, ethnicity, political affiliations, membership of professional trades and associations, and health and biometric information (including any relevant COVID-19 requirements). We will refer to sensitive information when we refer specifically to this type of information. Where we mention personal information, this automatically includes sensitive information.
- 1.3 We handle personal information in accordance with the *Cybercrime Code Act 2016* including the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data and this Policy.

## 2. Collection of Personal Information

- 2.1 We use the information we collect from you to deliver various products and services, including but not limited to:
  - (a) confirming the identity of individuals;
  - (b) contacting individuals;
  - (c) conducting educational and training courses;
  - (d) providing membership services;
  - (e) providing professional development courses for members (Professional Director Development);
  - (f) holding events such as conferences and briefings on current issues;

- (g) helping individuals find directorship positions (Director Placements);
- (h) providing mentoring and scholarship schemes;
- (i) providing confidential peer-to-peer forums (Women in Focus);
- (j) enabling members to assess their current director capability (Skills Matrix);
- (k) providing tools for boards to evaluate their governance (Board Evaluations);
- (l) lobbying and making submissions to government and others about improving governance laws and practices
- (m) entering into relationships with sponsors and other partners to financially support the IDAPNG's activities;
- (n) providing information and services through our website and via email, online advertisements and social media; and
- (o) undertaking activities, either directly or through our service providers, such as surveys, online behavioural advertising, website analytics and email campaign management.

2.2 We collect personal information for the purposes and aims stated in this Policy.

2.3 We collect personal information from our members, non-members (including participants in our courses and other individuals who interact with the IDAPNG), third parties, service providers, suppliers, contractors, consultants, and sponsors. The nature of such personal information varies and it is collected in different ways. More information about this is provided below.

2.4 In some instances, you may choose to provide information about another person, for example, the name and contact details of someone who might be interested in becoming a member. If you provide personal information about someone other than yourself to the IDAPNG, you must make sure that they have agreed to you providing their personal information to us. We also ask that you make them aware of this Policy, for example by giving them a link to it.

2.5 The IDAPNG has special protections in place to keep the personal information that we collect safe and secure. These special protections include:

- (a) training our staff to keep your personal information safe and secure;
- (b) putting contractual arrangements in place to protect your personal information when we disclose it (please see section 5 for information about disclosures);
- (c) implementing separate storage and technical restrictions on who can access the personal information; and
- (d) taking reasonable steps to destroy or de-identify your personal information when we no longer require it (for example for membership or legal purposes).

2.6 If the IDAPNG does not collect your personal information, we may not be able to provide some or all of our products and services to you. You may also find that you do not experience the full extent of our information and products and services, including our website.

## 2.7 Membership Information

- (a) To become a member, you must complete various membership related applications. Such applications request a range of personal information, including name and contact details, gender, and career history.
- (b) In some instances, you may start a membership application online without completing it. The information that is provided on the incomplete application is also collected by the IDAPNG and is used to contact you about becoming a member.
- (c) We also collect date of birth information on some of these applications to enable us to uniquely identify you and assess what products and services may be most suitable and of interest to you.
- (d) For ongoing membership management, including requests to upgrade or renew memberships, we collect personal information from members about:
  - (i) the reasons for changing their level of membership, such as proof of ill health, parenthood, study or travel; and
  - (ii) with the member's consent, or where provided by the member, their criminal history, director status and evidence of bankruptcy.
- (e) We also collect information about members from other sources, but only in circumstances where a member would reasonably expect the IDAPNG to do so, or where the member has consented to the IDAPNG collecting such personal information from another source, for example by responding to a specific request from the IDAPNG or by ticking a box at the time of completing a membership application.
- (f) Examples of personal information collected from other sources include work or character related information from a member's referees, information about criminal history records and information from publicly available sources.
- (g) Such personal information is required for the IDAPNG to verify information on certain membership related applications.

## 2.8 Information about event attendance, education and training – members and non-members

- (a) When you register your attendance at various events, including conferences and briefings conducted by the IDAPNG, you must complete an application. Such applications may (depending on the circumstances) request:
  - (i) your name, title, contact information, gender, occupation and location;
  - (ii) sensitive information such as whether you are a member of the IDAPNG or another professional body or association, or health information such as dietary or mobility requirements; and

- (iii) information about travel bookings (such as car services, hotel bookings, accommodation for residential courses, and local transport requirements).
- (b) The IDAPNG also collects a record of all attendees at its events.
- (c) During an event, the IDAPNG may collect images and sound recordings of the event, including of the attendees.
- (d) Where you participate in a course or other training, the IDAPNG also collects information about your enrolment, assessment answers, course results and feedback sheets.

## 2.9 Survey Information

- (a) From time to time, the IDAPNG or its service providers may collect personal information from survey participants, whether they are members or not. Such personal information may include name and contact details, gender, career history, location, membership of the IDAPNG or other professional body or association, opinions on trends and issues, and specific industries in which you are involved. Specific surveys may collect other types of personal information, however participation in a survey is voluntary, so if you don't want to provide the requested information you don't have to.
- (b) We will only use the personal information collected through surveys for analytical purposes, to assist with improvement or development of our products and services, and in relation to external studies conducted in partnership with unrelated third parties, including with other professional membership organisations and education institutes for research purposes.

## 2.10 Non-member Information

- (a) To expand the IDAPNG's membership, we collect information about prospective members from existing members who might refer a prospective member to the IDAPNG, from publicly available sources such as the Port Moresby Stock Exchange Register, and from commercial list brokers.
- (b) Information about prospective members will primarily include their name, past and present occupation, location, specific areas of interest, and contact details.
- (c) We also collect the name, title, organisation, post nominal, and credentials of any speakers, organisers, hosts, facilitators or trainers (**Presenters**) which we engage to conduct our events and courses. Such information is collected at the time of meeting potential Presenters for the purpose of considering whether the IDAPNG will proceed with the engagement. We may also collect or create other personal information about Presenters during the course of the training or event and after its conclusion, such as participant feedback, dietary or mobility requirements of Presenters, and follow up communications.

## 2.11 Market Research Findings

- (a) The IDAPNG commissions market research about members as well as non-members for various purposes, including for index surveys and feedback. If our survey provider also collects your personal information, that survey provider will make a copy of their privacy policy available to you, and their collection and use of your personal information will be subject to that privacy policy.

- (b) The IDAPNG only collects and holds market research information in aggregate form and does not connect any of this aggregate information with its personal information records to try and ascertain an individual's responses.

#### 2.12 Images and Recordings

- (a) The IDAPNG collects images (video or photographs) and sound recordings of its events, which may either be taken by the IDAPNG or by a service provider.
- (b) At the time of registering for an event, you will be given the option to indicate if you do not want the IDAPNG to collect and/or use any images or recordings of you. You may also contact the IDAPNG directly to express your preference.
- (c) The IDAPNG's contact details are provided in section 9.

#### 2.13 Applicants, Contractors and Consultants

- (a) If you are an applicant for a position with us, we will collect your name, contact details, educational and work history, and other information that you provide to us as part of the application process.
- (a) If you are a contractor or consultant, we will collect the name, contact details, and position of any individuals with whom we need to communicate in relation to goods or services that you provide.

### **Collection of personal information from our website, emails, apps and social media**

#### 2.14 Our Website

- (a) When you visit our websites or download, access or register to use our websites, (which may also include the use of any of our products, services or apps), we may collect your personal information such as your name, address, email address, phone number, date of birth, username, password and other information. We may also collect information automatically, including technical information related to your mobile device, your device's unique identifier, your mobile network information, the type of mobile browser you use and information about the way you use our products, services or apps.
- (b) Depending on the particular product, service or app you use, and only after you have agreed to such collection, for example at the time of first signing up for and installing an app, we may also collect information stored on your device, including contact information, location information or other digital content.
- (c) When you access our apps including 'IDAPNG Director' via your mobile device, our service provider collects username details to authenticate access to member-only content. We do not review or use this information for any purpose beyond authentication with our membership database.
- (d) We or our service providers use web analytics to collect a range of information about your interactions with our websites. Web analytics software collects the information using a number of techniques including cookies (both first and third party cookies) and Java Script.

We also use web analytics to collect information from the browsers of those who use our websites or participate in the IDAPNG LinkedIn group. Please refer to the IDAPNG [Cookie Policy](#) or further information about cookies and how we handle cookie data.

- (e) The information we collect using web analytics software includes your IP address, domain name, date and time of visit, the pages visited and time spent on each page, whether you have visited the site before and what site referred you to the web page. We use this information to evaluate the effectiveness of our websites and the level of interest in particular pages or the IDAPNG's campaigns.
- (f) We use a variety of technology to enhance your experience, including Google Analytics, behavioural marketing tools to build and score a profile which influences what marketing may be of interest to you, and tools to maintain contact with members, leads and prospects.
- (g) Our websites may contain links to other sites. We are not responsible for the privacy practices or policies of those sites and we suggest that you review the privacy policies of those other sites.

#### 2.15 Emails

- (a) If you send us an email, that particular address will be recorded automatically by our e-mail messaging system for the purpose of replying to your e-mail. However, if you are a member, we will normally use the e-mail address you provided in your membership application/renewal, unless you ask us to use a different e-mail address.

#### 2.16 Social Media

- (a) We participate in social media, for example, through our LinkedIn group. If we think it is relevant to the quality of service that the IDAPNG provides or its objectives, we sometimes note the nature of any topic discussed by a particular individual and their name. The IDAPNG may then contact the individual in a separate forum to further discuss the topic. In some instances, the IDAPNG may keep a note of the discussion, including details about what was discussed and any interesting insights provided by the individual, and details about when the discussion occurred.
- (b) Social media services also handle your personal information for their own purposes. These sites have their own privacy policies. We are not responsible for the privacy practices or policies of those sites and we suggest that you review their privacy policies.

### 3. Use of Personal Information

- 3.1 We will not use your personal information for any purpose which you would not reasonably expect unless it is consistent with the Act or Convention. If we think that you may not expect us to use your information for a purpose which is directly related to the purpose of our collection of that information, we will ask for consent before we use it for that purpose.

#### **Personal information from membership, training course and event applications**

- 3.2 We use such personal information to:

- (a) manage the membership of the IDAPNG and member participation in certain programs, including the Professional Director Development (**PDD**) program which is mandatory for membership renewal;

- (b) administer and meet member requirements for the particular service, course event or program;
- (c) help us improve a particular service, event or program;
- (d) identify and analyse your activities and interests to better meet member needs and attract new members;
- (e) enable us to target marketing communications to you (please refer to section 5 for further information); and
- (f) enable the IDAPNG to further its mission of influencing world leading organisation governance and practice.

### **Research Findings**

3.3 We use such information to:

- (a) identify your needs and ensure our products and services meet those needs;
- (b) identify prospective members and provide marketing approaches designed to recruit new members; and
- (c) provide up-to-date information to support lobbying activity and make submissions on issues and proposed laws.

### **Event images and recordings**

3.4 We use sound and image recordings of our events to promote the IDAPNG (including if the IDAPNG collaborates with a trusted third party), and to enable us to improve our events, and for educational purposes (such as webinars).

### **Data aggregation**

3.6 In some circumstances, we collect your personal information and de-identify it for the purpose of aggregating data. We primarily do this to better understand certain trends among our membership, to plan and execute marketing campaigns, to improve our products and services, or create new ones. We may also do so for internal reporting purposes.

3.7 We may aggregate data obtained through self-assessment tools made available through our board advisory services. Any access to non-aggregated data to provide our board advisory services is strictly limited to those employees who are providing the services.

3.8 We will not aggregate data for a purpose which you would not reasonably expect, unless it is consistent with the Act or Convention. If we have any doubt about whether you would expect us to aggregate your personal information for a certain purpose, we will seek consent from you.

### **Applicants, contractors and consultants**

3.9 If you are an applicant, we will use your personal information to process your application for a position with us.

3.10 If you are a contractor or consultant, we will use the personal information of your employees that you have provided to us to contact you in relation to any goods or services that you provide to us.

## 4. Communications

4.1 We may send various types of communications to you, depending on your indicated preference.

4.2 Our advertising and marketing material, content, information and communications (**Marketing Material**) is sent to you if our records indicate that you would like information about our products and services which may be of personal and/or professional benefit to you, whether you are a member or non-member. These products or services may extend beyond those provided by the IDAPNG, and may include offers from third parties that we or our providers consider may be of interest to you.

4.3 Our membership-related material, content, information and communications (**Membership-Related Material**) is sent to members. By signing up for membership and providing the IDAPNG with your contact details as part of that membership application, you consent to receiving Membership-Related Material. Membership-Related Material includes membership welcome letters, newsletters, or any other communication which does not involve promotion of any products or services, including those of the IDAPNG.

4.4 We may send any of these Marketing Materials or Membership-Related Materials by mail, telephone, email, SMS or other electronic methods, such as through social media or targeted advertising. If you indicate a preference for a method of communication, we will try to use that method where it is practical for us to do so.

4.5 When you access our websites, we may display customised marketing material to you based on data stored in your cookies. Your opt-out options may be different for this kind of marketing material (please refer to the IDAPNG **Cookie Policy** for further information about how we handle cookie data). Service providers we use, including remarketers, may also display our marketing material on other parties' websites that you visit. The display of that marketing material may be based on your prior visits to our websites and other internet activity. We may also use data supplied by service providers to improve our marketing material and advertising campaigns.

4.6 We give you the chance to opt-out of receiving Marketing Material and Membership-Related Materials in our communications with you, such as forms, letters or emails, or you can opt out by contacting us using the details provided in section 10 or by logging-in to your user account.

4.7 Unless you have opted out, we will continue to provide:

(a) Marketing Material and Membership-Related Material to members for 12 months after they have ceased to be members; and

(b) Marketing Material to non-members for 12 months after their last interaction with us.

## 5. Disclosure of your personal information

5.1 We only disclose your personal information for the purposes outlined in this Policy or for purposes that are directly related to those purposes that you would reasonably expect.

## **Events**

- 5.2 We disclose the name, title, organisation and post-nominal of event participants to:
- (a) any Presenters under strict conditions to enable them to carry out their role in relation to an event, for example, to organise table lists, or facilitate introductions;
  - (b) sponsors and potential sponsors to enable them to assess whether or not to sponsor an event;
  - (c) providers of special member offers from time to time under strict conditions; and
  - (d) event attendees in the form of a list showing the names of all the people who have registered to attend the event, unless at the time you registered for that event that you do not want your name included in such a list.
- 5.3 We also disclose the name, title, organisation, post-nominal, and credentials of any Presenters to the IDAPNG members and the public generally by way of our website to promote the particular event.

## **Courses**

- 5.4 We disclose the name, title, organisation and post nominal of course participants to other participants in that same course. This is shown as a list which is displayed on the day of the course showing the names of all the people who have registered to attend the course.
- 5.5 We also disclose the name, title, organisation, post-nominal, and credentials of any Presenters to the IDAPNG members, course participants, and the public generally by way of our websites for the purpose of promoting the particular course.

## **Publications**

- 5.6 We disclose information about members to other members via the IDAPNG publications, for example the Movers & Shakers Magazine. This information may include details about new members, their current employment, the successful completion of certain courses and articles written and inspired by members.
- 5.7 Our regional committees and special interest committees may also publish members' names, post-nominal and current employment in publicly available material, such as welcome notices in newspapers and periodicals.

## **Affiliated partners of the IDAPNG**

- 5.8 We disclose personal information to partners affiliated with the IDAPNG, including but not limited to our committee members, special interest groups, global director membership organisations and our training partners. These partners work on behalf of the IDAPNG to carry out specific responsibilities which we delegate to them.

Examples of this include conducting membership-related activities in regional areas, sending welcoming communications to new members, promoting the IDAPNG, coordinating information with international director membership organisations, conducting educational activities, or conducting advisory work.

- 5.9 Our affiliated partners are only permitted to use your personal information for the purpose for which they received the personal information, which we specify when we delegate responsibility to them.
- 5.10 Some of the IDAPNG's affiliated partners may be located outside Papua New Guinea. Please refer to the 'Overseas Disclosure' section below for further information.

### **Third party contractors and partners**

- 5.11 We disclose personal information to contracted service providers, including those service providers set out under the privacy headings in our **Terms and Conditions**, who assist us with a number of our functions and services including technology, data processing, contact centre, legal, accounting, applicant verification and assessment, business consulting, auditing, archival, delivery, banking, payments, market research, content production and mailing but only for the purpose of fulfilling those services.
- 5.12 Service providers may use cookies and other technologies to conduct certain activity, which then allows us to supply our services to you. Please refer to the IDAPNG **Cookie Policy** for further information about how we handle cookie data.
- 5.13 We also disclose personal information to partners in some of our programs, for example about applicants for scholarships to assist us with scholarship candidate assessment.

### **Other disclosures**

- 5.14 We may also disclose your personal information:
- (a) to other members of the IDAPNG where you have consented to us sharing that information - for example, if a member requests your contact details, we will call or email you to ask for your consent before sharing your details; and
  - (b) to employers and recruitment companies provided you have expressly consented (for example by email or phone) to such disclosure, and then only to the extent that you have consented.

### **Where authorised or required by law**

- 5.15 We may be obligated to disclose personal information in connection with law enforcement activities by enforcement bodies, for example, Australian Securities and Investments Commission investigations or other investigations into suspected fraud or unlawful activity.
- 5.16 We may collect and record certain information in our member register, and allow an individual to inspect the IDAPNG's member register and view current and past members' names and addresses. Inspection is free for members, but a fee may be payable by non-members. We will provide a copy of the register if you make a valid application to us and pay the relevant fee. However, we prohibit the individual from using the information gained to contact, or send material to, members, and from using it for other prescribed purposes and penalties apply for such misuse of such information.
- 5.17 We may also disclose personal information to Papua New Guinean and overseas regulatory authorities or other organisations to assist them with business licensing or due diligence purposes. This could include the fact that you are a member of the IDAPNG, the nature of your membership, the IDAPNG courses you have completed, and your grades.

## **Overseas disclosure**

5.18 From time to time, we may send your personal information overseas. Some of our service providers are located in other countries including the Australia and U.K. Where we use a service provider that hosts personal information in other countries, we take steps that are reasonable in the circumstances to ensure that the host does not breach International Privacy Principles. The steps we take include:

- (a) assessing whether the service provider is located in a country that has at least equivalent privacy protections to those in Papua New Guinea;
- (b) adding provisions in our contract with the service provider that require them to protect the personal information they hold; and
- (c) when choosing a service provider, including in our considerations the privacy law or scheme (if any) that applies in the country in which the service provider operates.

## **6. Security of personal information**

6.1 We regularly assess the risks of misuse, interference, loss, unauthorised access, modification or disclosure of personal information and ensure that we have adequate measures, including policies, procedures and technology, to address those risks.

## **7. Retention of personal information**

7.1 We hold member information for the period of your professional career.

7.2 We hold information relating to your attendance at a course or event for the period of your professional career.

## **8. Access and correction**

8.1 You have a right to ask for access to the personal information we hold about you. Unless there is a lawful reason not to, we will give you access to it and allow you to correct any incorrect information. We may charge a fee for access (but not correction), and will respond to your request within 30 days.

8.2 If you are a member, you can correct personal information we hold about you by logging onto your user account, or by contacting us using the contact details below.

8.3 If you are a non-member, you can ask to correct personal information we hold about you by contacting us using the contact details below.

8.4 We may ask you to verify your identity if you ask for access to your personal information, or to correct your personal information, to ensure we don't give information to the wrong person.

8.5 If we don't give you access to your personal information or refuse to correct it we will tell you why.

## **9. Contact details and concerns**

9.1 In the event that you have a question or concerns regarding the way in which we handle your personal information, you should contact us directly at:

P.O. Box 278, Port Moresby  
National Capital District 121  
Papua New Guinea  
Email: [director@idapng.org](mailto:director@idapng.org)

- 9.2 We take your privacy concerns seriously. Where you express any concerns that we have interfered with your privacy, we will respond within 48 hours to let you know who will be handling your matter and when you can expect a further response.

## **10. Changing this policy**

- 10.1 We may amend this Policy from time to time, including in response to legislative changes, and notify you of any amendments through our publications and by posting an updated version on [our website](#). Please let us know if you have any concerns about any changes to this privacy policy.
- 10.2 Any amendments to this Policy will be effective immediately once it is posted to our websites. Your use of our websites, products or services following such amendments represents that you agree to be bound by the Policy, as amended.
- 10.3 Suggestions about improving this Policy are welcomed. Please contact us at [director@idapng.org](mailto:director@idapng.org) should you wish to provide any feedback.