

ASI Privacy Policy

This Policy was adopted on 16 January 2020.

Who are we?

The Aluminium Stewardship Initiative (ASI) is a global, multi-stakeholder, non-profit standards setting and certification organisation. ASI's objectives are to:

- To define globally applicable standards for sustainability performance and material chain-of-custody for the aluminium value chain
- To promote measurable and continual improvements in the key environmental, social and governance impacts of aluminium production, use and recycling
- To develop a credible assurance and certification system that both mitigates the risks of non-conformity with ASI standards and minimises barriers to broad scale implementation

What is this Policy?

ASI is committed to protecting your privacy. Any personal information you provide us remains private and is only used for the purposes outlined below. While ASI is not by law subject to the Commonwealth Privacy Act 1988 (AUS) (Privacy Act), we strive to comply with the Privacy Act to reflect our commitment to privacy and ensure protection of your personal information.

This Policy explains how we collect your personal information, what we do with it and how we protect it. Please read it carefully. If you have any questions you can contact us directly on the details set out at the end of the Policy.

What personal information do we collect about you?

We only collect a limited amount of personal information that we need for what we do. The types of personal information that we may collect and hold about you are:

- your name and business contact details;
- preferences in relation to our events.

How do we collect your personal information?

We usually only collect information directly from you, but at times we may collect information about you from third parties with your consent (for example, the organisation that employs you, if it is an ASI member). We collect your personal information when you:

- visit our website at www.aluminium-stewardship.org (as explained in more detail below under the heading 'What happens when you visit our website');
- your employer submits application forms for ASI membership, ASI auditor accreditation or the ASI registered specialists program;
- you or your employer requests a user account on elementAI or educationAI;
- register to receive ASI communications;
- register for or attend any of our events or online webinars;
- participate in our public consultation processes and surveys;
- nominate for or are appointed to our Board or join one of our committees;
- speak at our events;
- inquire about or apply for a position with us;

- follow or interact with us on social media; and
- communicate with us.

How do we use your personal information?

We collect and use your information for the specific purpose of communicating with you, including (where relevant) to:

- process applications;
- manage your membership, auditor accreditation, or registered specialist status;
- communicate with you regarding your organisation's ASI certification;
- provide you with an account to access elementAI, ASI's online assurance platform;
- help us understand and respond to your interests and needs;
- record the identity of individuals submitting comments or questions as part of standards-setting processes and consultations;
- provide materials for, and retain a record of your attendance at, meetings, teleconferences, webinars and online training;
- communicate with you about our activities and inform you of our upcoming conferences and events (unless you elect not to receive such information).

For personal information related to public consultations, we will seek your agreement to inclusion of your name and/or organisation before it is included in any published records. Email addresses are not published.

When do we disclose your personal information?

The ASI Secretariat process your information in Australia, Canada, China, Germany, and the Netherlands. Our website is hosted in Belgium, in the European Union, and some of our platforms also host information in the USA and Singapore.

From time to time we may engage third party service providers to assist ASI. Where this involves those service providers processing personal information on behalf of ASI, ASI ensures that such processing is governed by strong privacy and data security terms. Our providers may carry out:

- mailing operations;
- event registrations;
- information technology services;
- account management services; and
- website and event usage analysis.

Where necessary for legitimate business purposes or for the purposes of compliance with our legal or regulatory obligations, we may also disclose your personal information to:

- our professional advisers;
- government and regulatory authorities and other organisations, as required or authorised by or under an Australian law or a foreign law in relation to any of our activities that take place overseas; and

We will not make any other disclosures unless this is permitted by the Privacy Act.

What happens when you visit our platforms?

When you visit our website, or use elementAI or educationAI, their web servers may record information such as the time, date and URL and IP address of your request. This information may be used by the service providers to improve their platforms.

Cookies: To improve your visits to our platforms, we may also use 'cookies'. A cookie is a small text file that our website may place on your computer as a tool to remember your preferences. This Privacy Policy places all users of our website on notice about our use of cookies. Your continued use of these platforms confirms to us that you are aware of our use of cookies and have no objection to this. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, if you do this, you may not be able to use the full functionality of our platforms.

Links to other sites: Our website may contain links to other websites operated by third parties. These are meant for our users' convenience only. We are not responsible for the content or practices of these other websites and they are not covered by this Policy. Before disclosing your personal information to another website operator, you should read their terms and conditions of use.

Google Analytics: Our website uses Google Analytics, a web analytics service provided by Google, Inc. We will use reports provided by Google Analytics to evaluate website traffic and webpage usage. Google Analytics does not identify individual users or associate your IP address with any other data held by Google.

Social media: Our website uses interfaces with social media sites such as LinkedIn and Twitter. If you choose to "like" or share information from our website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your site visit to your personal information.

How do we protect your personal information?

We strive to protect the security of the personal information that we collect and hold (in hard copy or electronically), through a combination of physical, technical and organisational security measures. We also apply the 'need to know' principle – restricting access to your personal information to those people or service providers who need to know that information to communicate with you and administer our activities.

How do we deal with complaints?

You can contact us by phone, email or mail on the details below to lodge a complaint and we undertake to respond within 30 days. If the complaint will take longer to resolve, we will provide you with a date by which we expect to respond.

If we cannot resolve your complaint you can contact the Office of the Australian Information Commissioner (OAIC) by:

- phone: 1300 363 992;
- email: enquiries@oaic.gov.au; or
- post: GPO Box 5218 Sydney NSW 2001

For further information about how to complain go to the OAIC's website www.oaic.gov.au

How do we correct your personal information?

We take reasonable measures to ensure that the personal information we collect, hold, use and disclose is accurate, complete, up-to-date and, when we use and disclose, that it is also relevant. However, the accuracy of that information depends to a large extent on the information you provide us.

If any personal information you provide us changes, or if you think that any of the personal information we hold about you is incorrect, please let us know using our contact details at the end of this Policy. We will need to verify who you are. We will notify you in writing if for any reason we will not correct the information in accordance with your request and we will explain how you can complain about our decision if you are not satisfied.

How can you access your personal information?

You have the right to access the personal information we hold about you, subject to some exceptions allowed by the Privacy Act. To request access to your personal information please contact us on the details at the end of this Policy. We will need to verify who you are before we provide access. We will notify you in writing if for any reason we will not give you access to some or all of the information you have requested and we will explain how you can complain about our decision if you are not satisfied.

How to contact us

You may contact us via email or you may write to us at:

Aluminium Stewardship Initiative Ltd
PO Box 4061, Balwyn East, VIC, Australia 3103
info@aluminium-stewardship.org

Revision history

Version 1 – adopted 17 August 2015
Version 2 – adopted 19 September 2017
Version 3 – adopted 16 January 2020