

IoT Security Institute Privacy Policy

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Privacy

Who we are

The Internet of Things Security Institute (IoTSI) is an academic and cyber industry body. The IoTSI is based in Australia, however our membership is global. We are dedicated to providing frameworks and supporting educational services to assist in managing security within an Internet of Things ecosystem. The IoTSI is currently staffed by a volunteer executive team and is supported on a volunteer basis by our members.

Privacy at the IoTSI

Privacy matters... to you, and to us. This document explains our policies and practices around the collection and use of your personal data, including how we give effect to your privacy rights. We will from time to time update this document to ensure that our approach to privacy is correctly reflected.

If you need to contact us with questions or concerns about the IoTSI's privacy practices, please send us an email: admin@iotsecurityinstitute.com

How we collect and use (process) your personal data

The IoTSI collects personal data about its members and anyone who wishes to contribute to our outputs. This information is limited to "the basics" but may include the kinds of information that can be found on a business card: first name, last name, job title, employer name, address, email and phone number.

We use this information to provide members with the range services described on our website, including membership services, access to educational content, collaboration via our meeting rooms, and the like. We do not sell your personal data to anyone and only share it with third parties who are facilitating the delivery of our content to you.

We do not knowingly attempt to solicit or receive information of any kind from children.

Personal data you give to us

Membership

When you become an IoTSI member, we collect information about you including your name, your chosen user name, password and your email address. You can voluntarily provide additional information in your membership profile, which can be edited at any time to change, add, or remove personal data.

We process your personal data for membership administration, to deliver membership benefits to you and to inform you of events, content, and other benefits or opportunities associated with your IoTSI membership.

The IoTSI relies on **fulfilment of contract** as the lawful basis under GDPR Article 6 for processing members' personal data.

Your correspondence with the IoTSI

If you correspond with us by email, the postal service or another form of communication, we may retain such correspondence and the information contained in it and use it to respond to your query; to notify you of IoTSI publications or other services; or to keep a record of your comment, compliment, complaint or other request. If you wish to have the IoTSI "erase" your personal data or otherwise cease communicating with you, please contact us at <u>admin@iotsecurityinstitute.com</u>

Note: if you ask the IoTSI not to contact you by email at a certain email address, we will need retain a copy of that email address (e.g. on a master "do not contact" list) in order to comply with your request.

The IoTSI has a legitimate interest in maintaining personal data of those who communicate voluntarily with us.

Publications

A key role of the IoTSI is to push relevant content to our members - e.g. about security in the context of IoT technologies.

In addition to producing original content, the IoTSI also subscribes to news articles, podcasts, blogs and content produced by others, which we often link to from our website. This means we may offer you a link to another organisation's website where you will find content that is relevant and useful to you. At these times, you will be leaving the IoTSI website. The IoTSI is not responsible or liable for content provided by these third party websites or the personal data they may happen to gather from you.

You may wish to access the IoTSI's content without becoming a member – e.g. listen to a podcast you are interested in. In most cases, you can simply visit our website to do this. In other cases, you may need to give us your email address so that we can send specific content (e.g. a publication) to you. We rely on **fulfilment of contract** as the lawful basis for using your personal data to action your request to receive content in the manner specified.

Note: The IoTSI uses Google Analytics to track how often people gain access to or read our content. We use this information in the aggregate to understand what content our members find useful or interesting, so we can produce the most valuable content to meet your needs.

From time to time, we may also conduct surveys (that we use to produce original research or other content) relevant to our brief. We do not track individuals for this purpose, and we look at information in the aggregate only. Participation in any IoTSI survey is voluntary.

A note about payment information

The IoTSI does not collect payments from you in any way, over our website or otherwise. You may choose to purchase goods or services via a link from the IoTSI website (such as when you select a book from our bookstore), however the link will take you to the primary site from which the goods or services are available and the transaction (and any personal data therein) will be subject to that site's privacy policy.

Purposes for processing your data

As explained above, the IoTSI processes your data to provide you with the services you have requested from us, including membership services, publications and other content. We use this information to refine our services to better tailor them to your needs and to communicate with you about other services or opportunities relevant to your membership. Most of the time, we process your personal data to directly fulfil your request for services – such as membership services.

A unique situation may arise where the IoTSI must rely on your consent to process your personal data, in which case we will keep a record of it and act in accordance with your choices.

Your personal data is not used by the IoTSI for direct marketing purposes.

What happens if you don't give us your data

You can access much of the IoTSI's content without giving us your personal data. Much of the information on our website is available even to those who are not IoTSI members. You are welcome to enter only the minimal amount of information (name and contact information) to your IoTSI member profile if you wish, and you can edit your profile at any time.

For members: Some particular types of personal data are necessary for the IoTSI to supply you with the services you have requested, and to authenticate you (during the log-in process) so that we know it is you and not someone else.

Cookies and tracking when you use our website (iotsecurityinstitute.com)

Our website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of the IoTSI website, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

The IoTSI has a legitimate interest in understanding how members and visitors interact with our website. This assists us with providing more relevant services and content.

Cookies and web beacons

Our website uses cookies. A cookie is a small piece of data that our website (iotsecurityinstitute.com) asks your browser to store on your PC, laptop, smartphone or other device. Cookies act like signposts, markers or tiny pieces of memory that enable us to give you the best experience possible when visiting our website.

Are cookies a risk to my privacy?

No. The cookies deployed by the IoTSI website are a combination of plain and encrypted text stored on your device and, when you access iotsecurityinstitute.com, they allow the website

to recognise you and provide you with specific content or services. They cannot replicate (i.e., make copies of themselves), execute pre-programmed functions, browse your device directories or otherwise fish for or seek out your personal information. The files are unable to scan, copy, read or retrieve your personal information.

The IoTSI does not use cookies to track your movement from our website to other websites (more information below). Except Google Analytics, which you may opt out of (please see information about how to do this below), we do not allow cookies to be used by third parties for advertising or other commercial purposes.

Do I have to allow the use of cookies?

No. However, the use of cookies by the IoTSI supports your use of our website, and disabling our ability to deploy them may prevent you from using our site with ease.

If you wish to disable, delete, prevent or clear cookies, you can follow the <u>instructions</u> <u>available on your web browser</u>.

Analytics

As part of the services supplied by our website management provider, the IoTSI uses Google Analytics to gather anonymous information about visitors to our website. This helps us monitor and improve the website and improve your user experience.

Google Analytics uses cookies and JavaScript code to gather information about how visitors use our website; such as, the number of visitors we receive, the type of web browser used and which of our pages were viewed.

You can choose not to allow Google to collect your information by opting out of Google Analytics.

Do not track

The IoTSI tracks when users enter their user name and password to cross from our primary public website (iotsecurityinstitute.com) to our "member" portion of the site. We also keep a record of third party websites accessed when a user is on our site and clicks on a hyperlink. But we do not track users when they cross to those subsequent sites, nor do we deploy or allow targeted advertising.

When and how we share information with others

Information about your IoTSI membership is maintained in association with your membership profile (My Profile). The personal information we collect from you is stored in one or more databases hosted by third parties located in the United States. These third parties do not use or have access to your personal information for any purpose other than cloud storage and retrieval.

Social media:

The IoTSI operates LinkedIn page, and those with an interest may choose to engage with us using that medium.

At present, the IoTSI only 'pushes' information out to members, prospective members and those with an interest in our work via LinkedIn. We will ask you before we 'tag' you in anything that we post (you may, of course, choose to 'tag' yourself or otherwise share information about yourself in that environment).

Before you send us information via LinkedIn (or any social media accounts), please be aware that personal information *supplied to us through* **or** *posted by us on* any social media outlet becomes captured by that outlet's privacy policy. As such, you may choose not to share your personal information with us using that medium.

Member Directory

We make member information available through the IoTSI Member Directory to other IoTSI members using this our website. Members are invited to opt-in to having their information shared in the Member Directory.

Sharing of your personal information is, otherwise, something we do only if you ask us to or there is a lawful requirement for us to do so.

Transferring personal data from the EU to Australia

The IoTSI is based in Australia. Information we collect from you will be processed in Australia.

To date, Australia has not sought nor received a finding of "adequacy" from the European Union under Article 45 of the GDPR. The IoTSI therefore relies on derogations for specific situations as set forth in Article 49 of the GDPR. In particular, the IoTSI collects and transfers to Australia personal data only:

- with your consent;
- to perform a contract with you; or
- to fulfill a compelling legitimate interest of the IoTSI in a manner that does not outweigh your rights and freedoms.

The IoTSI endeavours to apply suitable safeguards to protect the privacy and security of your personal data and to use it only in a manner that is consistent with your relationship with us (and as described in this document).

Security of your personal data

Protection of personal data from unauthorised access and disclosure is a priority for the IoTSI. To this end, we apply relevant physical, technical and administrative safeguards. These include the testing of our security technology on an ongoing basis and restricting access to your personal data to those with a legitimate "need to know" (for the purpose of establishing memberships and attending to member queries). The IoTSI volunteer executive team is trained in matters of privacy and security.

Any concerns about the security of personal data we hold should be reported to us without delay, by email to <u>admin@iotsecurityinstitute.com</u>.

Data storage and retention

Any personal data supplied to us electronically (on our website, via email or other means) is stored on the servers of our cloud-based web services and document management supplier, located in the United States. The IoTSI retains data for the duration of a member's relationship with us and for a period of time thereafter to allow members to recover accounts if they decide to renew. If you need more information about where and how long your personal data is stored, please contact us at admin@iotsecurityinstitute.com.

Data subject rights

The European Union's General Data Protection Regulation (GDPR) and other countries' privacy laws provide certain rights for data subjects. In Australia, where the IoTSI is based, privacy rights are set out in the *Privacy Act 1988*. These rights are complementary to those set out in the GDPR.

The information in this document, as set out above, is intended to provide you with information about the IoTSI's personal data handling practices. If you have any questions, please contact us at <u>admin@iotsecurityinstitute.com</u>.

If you wish to confirm that the IoTSI is processing your personal data, or to have access to (or seek correction of) the personal data the IoTSI may have about you, please contact us at <u>admin@iotsecurityinstitute.com</u>. We will do our utmost to respond within 48 hours when you contact us.

Note: You may also request that we erase the personal data we hold about you (or cease processing it), subject to certain exceptions.

Changes and updates to this Privacy document

This document may be updated to reflect relevant changes to the structure of the IoTSI, our membership offerings and other benefits. If we change this document, you may not be notified; however, we will always post a "last revised" date for your information.

Questions, concerns or complaints

Please contact us at <u>admin@iotsecurityinstitute.com</u> if you have any questions or concerns, or if you wish to make a complaint about our personal data handling practices.

Note: As the IoTSI is based in Australia, we will manage any complaints in accordance with the guidance set out in relation to the *Privacy Act 1988*. If you are unhappy with our response to your complaint, you have the right to take your complaint to the <u>Office of the Australian Information</u> Commissioner.

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