



## Impact Assessment Privacy Policy

*Last updated 15 January 2026*

Impact Assessment Pty Ltd is committed to providing quality services to you and this policy outlines our obligations to you in respect of how we manage your personal information.

"Personal information" is defined in the Privacy Act 1988 (Cth) to mean any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

This Privacy Policy explains how we may collect and use information that we obtain about you, and your rights in relation to that information. Your use of our online services or your provision of information to us constitutes your acknowledgment of the terms of this Privacy Policy. Please do not send us any of your personal information if you do not want it to be used in the ways described in this Privacy Policy.

We use your personal information to provide and improve our services. By using our services (including accessing our websites located at a domain or subdomain owned by us, including the website [www.impactassessment.org.au](http://www.impactassessment.org.au)), you agree to the collection and use of personal information in accordance with this policy. This Policy should be read together with our Cookie Policy, and any other location specific legal notice or terms that govern our relationship with you. We are required to manage your personal information in accordance with the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

### Why we collect and hold your personal information

We collect and hold several different types of information for various purposes to provide and improve our service to you. We can collect and hold personal information directly related to, or reasonably necessary for, one or more of our functions or activities.

These include:

- For the primary purpose of delivering our educational assessment platform (Impact Assessment powered by **Smartgrade**) and associated professional learning services, including administering, managing, maintaining and improving those services.
- To provide you with services relating to your subscription to Impact Assessment powered by Smartgrade, such as email updates.
- To understand how our services are being used and help us improve the resources we create.
- To ensure that our educational content is reaching the intended audience.
- To monitor usage of our service.
- To allow you to opt into updates relating to the site, and notify you about changes to our service.
- To allow us to invite you to share your views on how to improve Impact Assessment powered by Smartgrade and our other products and services.
- To provide customer care and support, including enable us to process your orders
- To provide analysis or valuable information so that we can improve our service.

- To detect, prevent and address technical issues.
- For any marketing purposes
- If you apply for employment with us, we may also collect information for the purpose of considering your application.

We may also use your personal information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

When we collect personal information we will, where appropriate and where possible, explain to you why we are collecting and holding the personal information and how we plan to use it.

We will only use your personal information for the stated purpose for which it was provided, with your consent, or otherwise in accordance with the law.

## **Types of personal information we collect and hold**

### *Personal information you input*

We may collect personal information from you if you have requested information (including via our website, social media, or via an email or other correspondence you send to us). If you apply for employment with us, we may also collect information for the purpose of considering your application including your qualifications and resume as well as reference information from your nominated referees.

### *Usage data*

We may also collect and hold information about how our resources are accessed and used ("usage data"). This usage data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. This information may be connected to a user's profile, but will be de-identified prior to any use in reports.

### *Order information*

If you purchase products or services from us, such as a subscription to Impact Assessment powered by Smartgrade, our payment gateway provider may also require your credit card details and billing information to process your transaction. These credit card details are not stored in any form by us or on any internal or external databases that are accessible to us.

### *Third-party plugin*

We may integrate third-party plugins into our services and the use of such third-party plugins results in data collection by us and the relevant third party. Your interactions with third-party plugins will be governed by the privacy policy of the company providing the third-party plugin.

### *Use of cookies*

In order to collect usage data, we may use software embedded in our websites (such as JavaScript) and we may place small data files (cookies) on your computer or other device. For our cookie policy [see link](#).

### *Information that you send to us by email or other electronic means*

You may also send us information about yourself by email or other electronic means (for example, through social media). In that case, we may record your name or account name and basic contact details and, of course, the information that you include in your communication.

When we invite you to provide information about yourself, it is entirely up to you whether you give us the information or not. Often, however, we will not be able to do something that you are asking for (for example, send you an e-newsletter, or respond to an enquiry) if you do not give us the information.

### *Information collected automatically by our website*

We use this information to improve our website, our assessment platform and associated services, and other materials that we provide. We do not use it to do anything that will affect you individually.

### **How we hold personal information**

We hold personal information in electronic form, and take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure.

We store electronic records within our own secure network and through third party data storage providers (as described in further detail below). Access is appropriately limited to personal information within our network.

Our third party data storage providers are required to protect personal information in accordance with applicable laws and take appropriate technical and organisation measures against unauthorised or unlawful use of personal information or its accidental loss, destruction or damage.

### **Disclosure of personal information**

We may share your personal information in the following circumstances:

- For the purposes of facilitating and delivering any Impact Assessment powered by Smartgrade subscription or other services you have requested or purchased from us, and purposes related to those services or as otherwise contemplated throughout this Policy;
- With trusted people or organisations who provide administrative, technology and financial services to us, including data processing and analysis, research, information technology services and support, marketing, and website maintenance/development. We will only disclose the minimum amount of information required;
- With our related bodies corporate and associated entities. We may share some or all of your personal information with those entities, where relevant or to assist with services we are providing to you or for other purposes contemplated in this Policy;
- Anyone you authorise us to disclose your personal information to; and
- Anyone to whom we are required or authorised to disclose the information by law, or to exercise a duty of care or defend our legal interests.

### **Overseas disclosure**

We do not store or transport personal information outside of Australia unless necessary to provide our services.

Where you have signed up for a subscription to the Impact Assessment powered by Smartgrade assessment platform, we will disclose your personal information for the purposes of delivering those services to you. The Impact Assessment powered by Smartgrade platform is owned and operated by Smartgrade Ltd, a company registered in England (Company no. 12415626). For more information about Smartgrade's privacy practices, and how they are relevant to your use of the platform, please visit Smartgrade's Australia-specific Privacy Policy located at <https://www.smartgrade.co.uk/privacy-policy-aus>. The personal information of Impact Assessment powered by Smartgrade platform is securely stored using Amazon Web Services (AWS) in Australia.

We may disclose personal information to provide technical support through Zendesk. If any personal information is disclosed overseas (primarily to the EU or UK, for example, to provide technical support), we will take reasonable steps to ensure recipients handle it in accordance with the Australian Privacy Principles.

We also disclose personal information to Hubspot only as strictly necessary, who we use to provide subscription services, such as email updates. HubSpot's product infrastructure is hosted on Amazon Web Services (AWS) in Australia.

## Security of personal information

We take reasonable steps to:

- Protect personal information that we holds against misuse, interference, loss, unauthorised access, modification or disclosure by utilising up-to-date electronic and physical security controls that comply with relevant industry standards and guidelines;
- Securely destroy or permanently de-identify personal information if it is no longer required.

Personal information may be kept on our information technology systems and third party providers.

- We use the following for hosting and storing data including personal information:
  - Amazon Web Services [aws.amazon.com/compliance/australia-data-privacy](https://aws.amazon.com/compliance/australia-data-privacy) - for hosting and storing data
  - Siteground [siteground.com/privacy](https://siteground.com/privacy) - to support hosting of data
  - Sendgrid <https://sendgrid.com/en-us/policies/security> - to provide subscription services, such as email updates
  - Hubspot [legal.hubspot.com/privacy-policy](https://legal.hubspot.com/privacy-policy) - to provide subscription services, such as email updates
  - Stripe [stripe.com/au/privacy](https://stripe.com/au/privacy) - for the purposes of managing payments
  - Xero [xero.com/au/about/legal/privacy/](https://xero.com/au/about/legal/privacy/) - for the purposes of managing payments
  - Grafana <https://grafana.com/legal/privacy-policy/> for the purposes of analysing website traffic
  - Google [policies.google.com/privacy?hl=en](https://policies.google.com/privacy?hl=en) - for the purposes of analysing website traffic
  - Zendesk <https://www.zendesk.co.uk/company/agreements-and-terms/privacy-notice/> and Intercom <https://www.intercom.com/legal/privacy> - for the purposes of providing technical support.

## Direct marketing

If you are an Impact Assessment powered by Smartgrade user or have otherwise expressed interest and provided us with your contact details, we may send emails to you with information about updates (such as publications, alerts and newsletters) and marketing our services.

We may use an "email management system" to automate the management and dispatch of these emails. The system allows us to collect personal information about you, such as whether you received and opened an email, and whether you clicked through to any links to our website. The personal information that the email management system collects and holds about you is used by us to ensure that you only receive correspondence that is relevant to your interests or your relationship with us, and to process any requests to unsubscribe. If you do not wish for us to send you such emails, please let us know by contacting us or by clicking on the "Unsubscribe" button at the bottom of our email notifications and following the prompts or by emailing us by clicking the 'Contact Us' button.

## Non-personal information

We may also use your personal information to create non-personal, de-identified and aggregated personal information for several purposes including for data analytics in order to help develop our website and services, for research, and promotional purposes. Any output is anonymised or aggregated so that no personal information or information relating specifically to you is reasonably identifiable.

## Access to your personal information

Subject to certain legal conditions, you have the right to request a copy of the personal information about you which we hold, to have any inaccurate personal information corrected. If you wish to do any of the above, please contact us using the contact information below. We may request that you prove your identity by providing us with a copy of a valid means of identification, in order for us to process your request. We will consider any requests for access or correction and provide you with a response in a timely manner.

## Maintaining the quality of your personal information

It is important to us that your personal information is up to date. We will take reasonable steps to make sure that your personal information is accurate, complete and up-to-date.

If any of the personal information that you have provided to us changes, for example, if you change your email address or if you wish to cancel any request, or if you become aware that we have any inaccurate personal information about you, please let us know using the contact information below.

## Complaints

If you would like to complain about any matter arising under the Australian Privacy Principles, you may contact our Privacy Officer at the details below.

We will respond to complaints within a reasonable period of time (usually 30 days).

If you disagree with our decision, you may refer your complaint to the Office of the Australian Information Commissioner by visiting [www.oaic.gov.au](http://www.oaic.gov.au), calling 1300 363 992 or by emailing [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

## Changes to our Privacy Policy

From time to time it may be necessary for us to review and revise our Privacy Policy. We may notify you about changes to this Privacy Policy, including by posting an updated version on our website, together with a ChangeLog. We encourage you to check our website from time to time to ensure you are familiar with our latest Privacy Policy.

## Privacy Officer

If you would like more information about the way we manage personal information, would like to request access to or correction of personal information that we hold about you, or wish to make a complaint, please contact our Privacy Officer by either:

Email: [contact@impactassessment.org.au](mailto:contact@impactassessment.org.au)

Post: Impact Assessment, PO Box 6023, Brown Hill, Victoria, 3350

## Change Log

Date	Change	Detail
15/12/2025	Minor updates	<ul style="list-style-type: none"><li>- Updated link to Smartgrade's Australia-specific Privacy Policy</li><li>- Updated detail on use of sub-processors</li></ul>
15/01/2026	Minor updates	<ul style="list-style-type: none"><li>- Updated detail on technical support and third party providers.</li></ul>