R.O.A.N

REPATRIATION OF A NATION

Privacy Policy

Average AF Pty Ltd · version 1.1 · 29 September 2026

1. The short version

We hold your contact details, your electoral division, and — if you vote or contribute analysis — a record of your political positions.

That last category is sensitive information under Australian law, and we treat it that way. Your individual votes in secret ballots are stored so that they cannot be linked back to you. We do not sell anything. We do not share your details with political parties, campaigners or advertisers.

The rest of this document is the detail.

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2. Who we are

2.1 This policy applies to **Average AF Pty Ltd ACN 647 769 579, ABN 24 647 769 579**, trading as the R.O.A.N Initiative ("R.O.A.N", "we", "us"). Average AF Pty Ltd is the entity that collects and holds the information described below.

2.2 Contact for privacy matters: **roanfeedback@proton.me**. General enquiries: roaninitiative@proton.me.

2.3 Our position on the Privacy Act. Some small organisations are not bound by the *Privacy Act 1988* because of the turnover threshold in section 6D, and some activities of registered political parties sit outside it under section 7C. **R.O.A.N does not rely on either.** We apply the Australian Privacy Principles in Schedule 1 of the *Privacy Act 1988* as though we were bound by them, and we will comply with the Notifiable Data Breaches scheme in Part IIIC.

An organisation proposing audited disclosure standards for members of Parliament is in no position to claim an exemption from the rules about how it handles its own members' data.

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3. What we collect

3.1 When you join or create an account

- Name
- Email address, and mobile number if you provide one
- Residential address
- The Commonwealth electoral division and the State or Territory derived from that address
- Date of joining

3.2 When you participate

- Proposals, analyses, comments and corrections you submit
- Which ballots you have voted in
- Your vote, in the manner described in clause 5
- Positions you record on specific legislation
- Any office you nominate for or hold, and the interests you disclose in connection with it

3.3 Automatically

- IP address, browser and device information, pages visited, and dates and times
- Cookies as described in clause 9

3.4 If you donate

- Payment details are handled by our payment provider. **We do not store card numbers.** We retain the record of the donation, its amount and date, as required for our own accounts and for any disclosure obligation.

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4. Sensitive information, and why we make a point of it

4.1 The *Privacy Act 1988* defines "sensitive information" in section 6(1), and it includes **political opinions** and **membership of a political association**.

4.2 Both apply here. Your membership of R.O.A.N is sensitive information. So is any record of how you voted on a proposal, or what position you took on a bill.

4.3 Under Australian Privacy Principle 3, sensitive information may generally only be collected with consent. **By joining R.O.A.N, or by voting or submitting analysis, you consent to us collecting that information for the purposes in clause 6.** You can withdraw consent at any time by closing your account under clause 11.

4.4 We do not collect any other category of sensitive information — health, racial or ethnic origin, religious beliefs, sexual orientation, criminal record or the rest. Do not send it to us. If you do, we will delete it.

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5. Voting data — how ballots are handled

5.1 Secret ballots. Where a ballot is secret, the record of the vote is stored **separately from the identity of the voter**, structurally, so that no query can rejoin them. We can confirm *that* you voted. We cannot determine *how* you voted, and neither can anyone else with access to our systems.

5.2 Open ballots. Some decisions are taken by recorded vote, where names are published deliberately for accountability within the organisation. Any ballot of that kind is **clearly marked as open before you cast your vote**. If you do not want your name recorded, do not vote in an open ballot.

5.3 Published results. After a ballot we publish the result, the count, and the anonymised ballot data so members can verify it independently. Anonymised data contains no identifying information and cannot be linked back to a voter.

5.4 We do not disclose to any person — including to our own Council — how an individual voted in a secret ballot, because we are not able to.

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6. Why we collect it

- To administer your membership
- To determine which division and jurisdiction you vote in
- To run ballots, verify eligibility, and ensure one member votes once
- To publish collaborative analysis of legislation
- To meet obligations under our Constitution, including disclosure by office holders
- To communicate with you about meetings, ballots and the organisation's work
- To meet legal, accounting and any electoral disclosure obligations
- To protect the security of the site

We do not use your information for any other purpose without your consent.

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7. Who we disclose it to

7.1 We do not sell your information. We do not trade, rent or exchange it. We do not provide it to political parties, campaign organisations, data brokers or advertisers.

7.2 Service providers. We use third parties to host our systems, send email, and process payments. They may access personal information only to provide that service and are bound to protect it.

7.3 Published information. Material you submit for publication — analysis, proposals, comments — is published with your name unless you ask otherwise before submitting.

7.4 Office holders. If you nominate for or hold an office in R.O.A.N, the interests you disclose under the Constitution are visible to all members. That is the point of them.

7.5 Aggregate figures. We publish membership numbers by State and by division. These are counts. They identify nobody.

7.6 Where required by law. We will disclose information if compelled by a court order, subpoena, or a law that requires it. Where we are permitted to tell you that has happened, we will.

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8. Where it is held

8.1 Our website and systems are hosted with third-party providers. Personal information is encrypted in transit and at rest.

8.2 Overseas storage. Some of our service providers store or process data outside Australia, including in the United States. Where that happens it is a cross-border disclosure under Australian Privacy Principle 8, and we take reasonable steps to ensure those providers handle your information consistently with the Australian Privacy Principles.

8.3 Access controls. Access to the membership register is limited to those who need it to perform a role, and is logged.

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9. Cookies and analytics

9.1 We use cookies necessary to keep you logged in and to keep the site secure.

9.2 We do not use advertising cookies or third-party tracking for advertising purposes. Where we use analytics to understand how the site is used, it is configured to collect aggregate usage information rather than to build a profile of you.

9.3 You can block cookies in your browser, but parts of the site will stop working.

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10. How long we keep it

10.1 Membership records are kept while you are a member, and for twelve months afterwards.

10.2 Financial records are kept for seven years, and any record we are required by law to keep is kept for the period that law requires.

10.3 Anonymised ballot data is kept indefinitely, because published results must remain verifiable. It identifies nobody.

10.4 Your residential address is used to determine your Commonwealth electoral division. **Once the division is determined we retain your suburb, postcode, division, and State or Territory, and we do not retain the street address.** This reduces what a breach could expose to something that could not identify your home.

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11. Access, correction and deletion

11.1 You may ask for a copy of the personal information we hold about you. We will respond within thirty days and will not charge for a straightforward request.

11.2 You may ask us to correct anything inaccurate.

11.3 You may close your account and ask us to delete your personal information. We will do so, except where we are required by law to keep a record, or where deletion would compromise the integrity of a published ballot result. **We cannot remove your vote from a completed ballot, because we cannot identify which vote is yours.**

11.4 Requests go to **roanfeedback@proton.me**.

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12. Data breaches

12.1 If a breach occurs that is likely to result in serious harm, we will notify affected individuals and the Office of the Australian Information Commissioner in accordance with the Notifiable Data Breaches scheme.

12.2 We maintain a written breach response plan.

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13. Complaints

13.1 Complain to us first, at **roanfeedback@proton.me**. We will acknowledge within seven days and respond within thirty days.

13.2 If you are not satisfied, you may complain to the Office of the Australian Information Commissioner at oaic.gov.au, or by telephone on 1300 363 992.

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14. Children

The site is not directed at people under 16. We do not knowingly collect information from them. Membership requires eligibility for the Commonwealth electoral roll.

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15. Changes

We may update this policy. The current version is published here with its date. Material changes affecting how we handle existing information will be notified to members before they take effect.

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*The R.O.A.N Initiative is a trading name of **Average AF Pty Ltd** ACN 647 769 579, ABN 24 647 769 579.*