

ISO 27701 does not replace the Privacy Act — it gives you a management system that makes compliance demonstrable rather than asserted. Note the 2025 revision: ISO/IEC 27701 is now a stand-alone standard and Annex A is one consolidated annex of 78 controls across three tables. Always confirm against the current instrument; the Privacy Act and APP Guidelines are amended periodically.

APP	TITLE	WHAT THE APP REQUIRES	WHERE A PIMS ANSWERS IT	WHICH ANNEX A TABLE APPLIES	EVIDENCE TO RETAIN
APP 1	Open and transparent management of personal information	Manage personal information openly and transparently, with a clearly expressed and up-to-date privacy policy	Clause 5 leadership and the privacy policy; Clause 7 documented information	A.1 controller, A.3 shared	Published privacy policy with version history and review dates
APP 2	Anonymity and pseudonymity	Give individuals the option of not identifying themselves, or of using a pseudonym, where lawful and practicable	Clause 8 operational controls on collection design	A.1 controller	Design records showing where anonymity was offered and where it was ruled out, with the reason
APP 3	Collection of solicited personal information	Only collect personal information reasonably necessary for your functions, and collect sensitive information only with consent	Clause 6 privacy risk assessment; collection-limitation controls	A.1 controller	Records of processing activities with a stated purpose and lawful basis per activity
APP 4	Dealing with unsolicited personal information	Determine whether unsolicited information could have been collected under APP 3; destroy or de-identify it if not	Clause 8 operational controls; retention and disposal	A.1 controller, A.3 shared	Disposal log for unsolicited information with the assessment recorded
APP 5	Notification of the collection of personal information	Notify individuals of the collection and the matters listed in APP 5.2, at or before the time of collection	Transparency and notice controls	A.1 controller	Collection notices, dated, mapped to each collection point
APP 6	Use or disclosure of personal information	Use or disclose only for the primary purpose, or a permitted secondary purpose	Clause 8 purpose-limitation controls	A.1 controller	Purpose register with secondary-use decisions and the exception relied on
APP 7	Direct marketing	Do not use or disclose personal information for direct marketing unless an exception applies, and always provide an opt-out	Consent management and opt-out handling	A.1 controller	Consent and opt-out records with timestamps
APP 8	Cross-border disclosure of personal information	Take reasonable steps to ensure an overseas recipient does not breach the APPs	Clause 8 transfer controls; supplier and processor management	A.1 controller, A.2 processor	Transfer register: recipient, country, safeguard relied on, contract clause reference
APP 9	Adoption, use or disclosure of government related identifiers	Do not adopt, use or disclose a government related identifier as your own identifier except in limited circumstances	Identifier-handling controls	A.1 controller	Identifier inventory with the justification for each use
APP 10	Quality of personal information	Take reasonable steps to ensure information collected, used or disclosed is accurate, up to date and complete	Clause 9 monitoring and measurement; data-quality controls	A.1 controller, A.3 shared	Data-quality checks with dates, findings and corrections made
APP 11	Security of personal information	Take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure; destroy or de-identify when no longer needed	Table A.3 shared security controls; Clause 8 operational controls; retention and disposal	A.3 shared security	Access reviews, encryption evidence, retention schedule and destruction certificates
APP 12	Access to personal information	Give an individual access to their personal information on request, subject to exceptions	PII principal rights handling	A.1 controller	Access request log with dates, outcome and any exception applied
APP 13	Correction of personal information	Correct personal information on request or where you are satisfied it is inaccurate	PII principal rights handling	A.1 controller	Correction request log, including notifications to third parties where required

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