

Pharmaceutical Society of Australia

Privacy Statement and Policy

2016
NOVEMBER

1. Background

The Pharmaceutical Society of Australia Ltd ACN 008 532 072 (PSA) is committed to protecting the privacy of members and non-members and ensuring the security of personal information maintained with the organisation. In this regard, it endorses the Australian Privacy Principles (set out in amendments to the Privacy Act 1988 which took effect on the 12 March 2014) and has adopted them in PSA's management of personal information.

PSA is committed to best practice in protecting the privacy of the personal information it collects and receives. This Privacy Policy seeks to explain how PSA collects, uses, discloses and otherwise handles personal information. It also seeks to explain how you can ask to access and correct the personal information we hold about you or complain about any suspected privacy breach.

A copy of this Privacy Policy is available on the PSA website. A printed copy can be obtained free of charge by contacting our Privacy Officer (details under heading 11 below).

1.1 What is personal information?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is either identified or reasonably identifiable. Examples include an individual's name, address, contact number and email address.

1.2 Our obligations

PSA is required to comply with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act). The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection/receipt to use and disclosure, storage, accessibility and disposal.

We are also required to comply with other, including more specific privacy legislation in some circumstances, such as:

- applicable legislation of the other national jurisdictions in which PSA operates;
- applicable Australian State and Territory health privacy legislation when we collect and handle certain health information; and
- the Spam Act 2003 (Cth) and the Do Not Call Register Act 2006 (Cth).

2. The purposes for which we collect, hold, use and disclose personal information

2.1 General

PSA needs personal information to be able to perform its core functions, including admission to membership, membership administration, continuing professional development, invitations to networking events, administration of programs such as Self Care and management of professional conduct. In addition, PSA has subsidiary functions to benefit its members, under our Member Benefits program. PSA also operates a number of Branch Committees, Special Interest Groups, member's advisory bodies, discussion and other member groups for the benefit of members.

We collect most personal information direct from you, for example, when you fill in an application for admission, readmission, concession or direct debit, a qualifications assessment or purchase a product or service. Information may also be collected direct from you when you deal with us personally, over the telephone, send a letter or email, or visit the website.

Our core services to members include education, training, technical support and advocacy. Staff and members work together with local and international bodies to represent the views and concerns of the profession to governments, regulators, industries, academia and the general public. PSA also interacts with non-members, both prospective members and also the general public.

2.2 The main purpose

The main purposes for which we collect, hold, use and disclose personal information are to provide services and benefits to our members, and to maintain, retain and grow our membership.

For those above purposes, our activities include:

- Membership management
- informing potential members about the benefits of membership;
- processing applications for membership;
- managing memberships (for example, by sending out renewal notices and recording and updating membership details and profile information);
- distributing our annual reports, and sending notices of events;
- Member services and publications
- distributing newsletters, including Australian Pharmacist magazine;

- managing Divisional and Branch Councils and other member groups;
- organising and holding discussion groups to consider topics of interest to pharmacy; and
- providing members with access to and information about a range of current and future membership services and benefits, including Member Benefits (see further below)

2.3 Training and events

PSA also collect, hold, use and disclose personal information for training and events:

- as part of administering our CPD program (including informing members about CPD requirements, developing, promoting and conducting CPD events for members and non-members, keeping records of CPD attendance and conducting CPD audits);
- developing, promoting and conducting other events (whether digitally, online, face-to-face or otherwise), including flagship events such as the Annual Therapeutic Update, Clinical and Practice Expo and the Pharmacy Australia Congress, as well as seminars and conferences (including organising speakers, locations and catering, making travel arrangements where required and keeping attendance records);
- as part of the enrolment procedure to courses as an RTO, PSA collect information such as date of birth and proof of identity which may be supplied to third parties as part of PSA funding contracts;
- under the Intern Training Program (ITP), personal information is disclosed to third parties in line with the Intern Training Program Agreement to eTG and eMIMs to enable access to products for Interns. PSA may also disclose this information to the Pharmacy Board of Australia, Australian Pharmacy Council and their preceptor as part of the ITP accreditation requirements;
- information may also be disclosed to third parties such as the Australian Pharmacy Council in relation to PSA's status as a CPD accrediting organisation, specifically for author bios;
- developing, administering, supporting and assessing PSA's educational programs; and
- developing new public practice resources and services

2.4 Surveys, research and competitions

- conducting surveys and market research for product and service improvement purposes and to compile statistics and analyse trends;

- considering research grant applications and administering research grants; and
- conducting competitions and lucky draws

2.5 Professional conduct

- ensuring that our members comply with PSA's Constitution, By-Laws, Code of Professional Conduct, and supporting Regulations;
- investigating and resolving complaints about members;
- referring member to a disciplinary tribunal if necessary; and

3. General administration

PSA also collect, hold, use and disclose personal information for general administration purposes:

- recruiting staff and contractors;
- processing payments;
- answering queries and resolving complaints; and
- using aggregated information for business analysis

3.1 Other activities – we may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are:

- required or authorised by or under law (including, without limitation, privacy legislation); and
- for which the individual has provided their consent

3.2 Direct marketing

We may use personal information of members and non-members, specifically your name and relevant address details, to let you know about our services, facilities and benefits and those of third party partners/contractors/suppliers of PSA, where we have your consent. We are not permitted to do so unless we have your consent. We and/or our partners/contractors/suppliers may contact you for direct marketing purposes in a variety of ways, including by mail, email, SMS, telephone, online advertising or facsimile.

For example, where we have your consent, we will send you:

if you are a Member:

- our Member publications and events;
- information under our Members Benefit and other program offerings and advertising of the availability of goods, facilities and services in the classes of personal and business products and services, including credit cards and associated rewards, banking and financial services, insurance, telecommunications, travel and leisure, news publications and subscriptions, technology, lifestyle offers, business support services and classes that we may create from time to time; and

if you are a prospective member and have provided consent, we may use your personal information to contact you with information about PSA and our current and future membership benefits.

3.3 Opting out

Where you have consented to receiving direct marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, in the following ways:

- Members and non-members can update their communications preferences (including opting out of participating in surveys) by simply visiting the 'Update my Details' page on the PSA website; and

Members and non-members can email to privacyofficer@psa.org.au, send a letter to the PSA Privacy Officer at the address below; advise us if they receive a marketing call that they no longer wish to receive these calls; use the unsubscribe facility that we include in our commercial electronic messages (such as emails and SMS) to opt out of receiving those messages.

3.4 Notification of source

If we have collected the personal information that we use to send you direct marketing material from a third party (for example a direct mail database provider), you can ask us to notify you of our source of information.

4. The kinds of personal information we collect and hold

4.1 The type of personal information that PSA collects and holds about you depends on the type of dealings that you have with us.

For example, if you:

- join as a Member, we collect information including your name, address, contact number, gender, date of birth, address, email address, proof of identity details, employment details, including your qualification, registration details with AHPRA, CPD details, communication preferences and payment details; and we allocate you a member number and membership status; we seek to keep those details updated;
- are involved on a Branch Committee, an advisory, discussion or other member group we will obtain your name, address, contact number/s, email, addresses, professional credentials and dietary requirements;
- undertake a PSA professional program, or contact us with an enquiry, noting that if you do not take advantage of the option to use anonymity or pseudonymity, depending on the nature of the enquiry, we will record details about you relating to the enquiry;
- attend a PSA conference, seminar, or event we will collect your contact details, address, membership number (if applicable), employment details, payment details and any dietary and accessibility requirements;
- are a supplier to PSA, we collect contact address details, usually including but not limited to all forms of contact and address, billing information and information about the goods and/or services you supply;
- are a sponsor of PSA, we collect contact address details, usually including but not limited to all forms of contact and address, and information about the sponsorship;
- apply for a job at PSA, we will collect the information you include in your application for employment, including your cover letter, resume, contact details and referee reports;
- are an academic, or industry expert or media contact of PSA will obtain your name, address, contact number/s, email, addresses, professional credentials;

- are a member of the general public who contacts PSA and who elects not to rely on anonymity or pseudonymity, we collect contact address details, usually including but not limited to email addresses and phone numbers and details about the reason for the contact; and
- are a recipient of complimentary copies of Australian Pharmacist, such as selected academics, media industry members, high-profile business or governmental persons, we collect contact address details.

4.2 Sensitive information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection. Sensitive information includes health and genetic information and information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record and some types of biometric information.

PSA's policy is only to collect sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; or
- we are required or authorised by or under law (including applicable privacy legislation) to do so
- For example, we may collect:
 - information about dietary requirements or mobility needs when we conduct events such as conferences and seminars;
 - copies of medical reports and psychiatric assessments in the course of a professional conduct investigation;
 - identification as Aboriginal or Torres Strait Islander; and information with regard to criminal convictions in relation to Members, students and prospective members

4.3 Collection of information other than personal information through our website

When you visit the PSA website, some of the information that is collected about your visit is not personal information, because it does not reveal your identity.

4.3.1 Use of Cookies

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies used by PSA may identify individual users who log into the website.

Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies, or to notify you when they are being used. There are also software products available that can manage cookies for you. Rejecting cookies can, however, limit the functionality of our website (such as preventing users from logging on and making purchases).

PSA also uses online behavioural advertising as part of optimising email campaigns based on audience behaviour e.g. reaction or no reaction to a campaign.

4.4 What if you don't want to provide your personal information to us?

PSA's policy is to provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us if it is lawful and practicable to do so. A pseudonym is a name or other descriptor that is different to an individual's actual name.

For example, PSA's policy is to enable you to access our website and make general phone queries without having to identify yourself and to enable you to respond to our surveys anonymously.

In some cases however, if you don't provide us with your personal information when requested, we may not be able to respond to your request or provide you with the product or service that you are seeking. For example, you must identify yourself to become a PSA member and you must disclose your member identification number if you wish to access services and products that are made available only to members.

5. How we collect and hold personal information

5.1 Methods of collection

PSA is required by the Privacy Act also to collect personal information only by lawful and fair means. If it is reasonable and practicable, we will collect personal information we require directly from you. We collect personal information in a number of ways, including:

- by email;
- over the telephone;
- through written correspondence (such as letters, faxes and emails);
- on hard copy forms (including event registration forms, network registration forms competition entry forms and surveys);
- in person (for example, at job interviews and in exams);
- through our website (for example, if you make an online purchase or complete and submit a web form such as the Update my Details form or a membership application form, or if you participate in a live chat);
- at seminars and functions (for example, if you fill out an assessment form or leave us your business card);
- during examinations and assignments conducted as part of our educational programs;
- electronic systems such as Applications;
- through surveillance cameras (which we use for security purposes); and
- from third parties, including educational providers that assist us in running our educational programs (including organising and conducting assessments); direct marketing database providers; the Australian Taxation Office or the Australian Health Practitioners Regulation Agency (for example, through correspondence in relation to member conduct); insurers in relation to professional indemnity insurance; and public sources, such as telephone directories, membership lists of business, professional and trade associations, and searches of court registries

5.2 Collection notices

Where PSA collects personal information directly from you, PSA's policy is to take reasonable steps to notify you of certain matters. We will do this at or before the time of collection, or as soon as practicable afterwards. The matters include:

- our identity and how to contact us;
- the purposes for which we are collecting the information;
- whether the collection is required or authorised by or under an Australian law or a court or tribunal order;
- the third parties (or types of third parties) to whom we would normally disclose information of that kind;
- whether any of those third parties are located overseas and, if practicable to specify, the countries in which they are located; and
- the fact that this Privacy Policy contains information about how to access and correct personal information and make privacy complaints (and how we will deal with those complaints).

We will generally include these matters in a collection notice. For example, where personal information is collected on a paper or website form, we will generally include a collection notice, or a clear link to it, on the form.

Collection notices may provide more specific information than this Privacy Policy in relation to particular collections of personal information. The terms of this Privacy Policy are subject to any specific provisions contained in collection notices and in the terms and conditions of particular offers, products and services. We encourage you to read those provisions carefully.

Where PSA collects information about you from a third party, PSA's policy is to take reasonable steps to make sure that you are made aware of the collection details listed above and, if you may not be aware that that we have collected the information, of the fact and circumstances of the collection.

5.3 Unsolicited information

Unsolicited personal information is personal information we receive that we have taken no active steps to collect (such as an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement).

We may keep records of unsolicited personal information if the Privacy Act permits it (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, PSA's policy is to destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

5.4 Disclosure of personal information to third parties

Under PSA's policy, personal information may be disclosed to the following third parties where appropriate for the purposes set out under heading 2 above.

- financial institutions for payment processing;
- universities and other educational service providers involved with or engaged by PSA for PSA professional programs;

- our Member Benefits partners and sponsors (so that they can provide members with information about their products and services);
- members of PSA committees (such as Branches, advisory committees, member and discussion groups formed to consider topics of interest to the pharmacy profession);
- government and regulatory bodies (such as the Department of Immigration and Border Protection, Australian Education International – National Office for Overseas Skills Recognition and the Department of Employment) and an individual's migration agent (in connection with applications for General Skills Migration);
- referees whose details are provided to us by job applicants;
- third parties who have complained about members (including to advise them of the conduct and outcome of the complaint); and
- PSA's contracted service providers, including:
 - information technology service providers;
 - publishers of our course material;
 - conference organisers;
 - marketing and communications agencies;
 - call centres and call training centres (including the third party that conducts member surveys on our behalf);
 - mailing houses, freight and courier services;
 - printers and distributors of direct marketing material; and
 - external business advisers (such as recruitment advisers, auditors and lawyers)

In the case of these contracted service providers, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

6. Cross border disclosure of personal information

6.1 Conferences

PSA may disclose personal information to third parties located overseas should you attend a PSA conference, seminar or event offshore. This may include supply of information to sponsors of PSA, industry bodies with whom PSA have a recognised agreement with and academic institutions supporting the event. (refer to clause 4.1)

7. Use of government related identifiers

PSA's policy is to not:

- use a government related identifier of an individual (such as a Medicare number or driver's licence number) as our own identifier of individuals; or
- otherwise use or disclose such a government related identifier, unless this is permitted by the Privacy Act (for example, where the use or disclosure is required or authorised by or under an Australian law or a court/tribunal order).

8. Data quality and security

8.1 General

We hold personal information in a number of ways, including in electronic databases, email contact lists, and in paper files held in drawers and cabinets, locked where appropriate. Paper files may also be archived in boxes and stored offsite in secure facilities. PSA's policy is to take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant; and
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure

You can also help us keep your information up to date; by letting us know about any changes to your personal information, such as your email address or phone number. If you are a Member, you can easily review and update your information on an on-going basis, through our online 'Update my Details' page.

8.2. Information and Communications Technology (ICT) Security

PSA implements ICT security (such as encryption, firewalls, anti-virus software and login and password protection), secure office access, personnel security and training and workplace policies to protect your personal information. All cloud services used by PSA are hosted within Australia.

8.3 Payment security

PSA processes assessment, membership and other payments using EFTPOS and online technologies. PSA's policy is to ensure that all transactions processed by PSA meet industry security standards to ensure payment details are protected.

8.4 Website security

PSA strives to protect the personal information and privacy of website users, though we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact PSA by telephone or post.

You can also help to protect the privacy of your personal information by keeping passwords secret and by ensuring that you log out of the website when you have finished using it. In addition, if you become aware of any security breach, please let us know as soon as possible.

8.4.1 Third party websites

Links to third party websites that are not operated or controlled by PSA are provided for your convenience. PSA is not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

9. Access and correction of your personal information

Individuals have a right to request access to the personal information that PSA holds about them and to request its correction.

9.1. Members and prospective members

Members and prospective members can readily access and correct their own personal information, including changing their communication preferences, by visiting the Update my Details page on the PSA website.

For any personal information that can't be accessed and corrected through 'Update my Details', members and prospective members can follow the access and correction procedures for non-members (set out under the next heading).

9.2. Non-Members

If you are not a member, you can contact our Privacy Officer (details under heading 11 below) if you would like to access or correct the personal information that we hold about you. We may ask you to verify your identity before processing any access or correction requests, to ensure that the personal information we hold is properly protected.

10. Access to and correction of Personal Information

10.1 Access

PSA's policy is to provide you with access to your personal information, subject to some exceptions permitted by law. We will also generally provide access in the manner that you have requested (e.g. by providing photocopies or allowing a file to be viewed), provided it is reasonable and practicable for us to do so. We may however charge a fee to cover our reasonable costs of locating the information and providing it to you.

10.2 Corrections

If you ask us to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, PSA's policy is to take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

10.3 Notification

If we correct personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, PSA's policy is to take reasonable steps to do so, unless this would be impracticable or unlawful.

10.4 Timeframe for access and correction requests

Except in the case of more complicated requests, we will endeavour to respond to access and correction requests within 30 days.

10.4.1 What if we refuse your request for access or correction?

If we refuse your access or correction request, or if we refuse to give you access in the manner you requested, PSA's policy is to provide you with a written notice setting out:

- the reasons for our refusal (except to the extent that it would be unreasonable to do so); and
- available complaint mechanisms

In addition, if we refuse to correct personal

information in the manner you have requested, you may ask us to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, and we will take reasonable steps to associate the statement in such a way that will make it apparent to users of the information.

11. Complaints

If you have a complaint about how PSA has collected or handled your personal information, please contact our Privacy Officer (details under heading 11 below). Our Privacy Officer will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a working week.

If your complaint can't be resolved at the first instance, we will ask you to complete a Privacy Complaint Form, which details (for example) the date, time and circumstances of the matter that you are complaining about, how you believe your privacy has been interfered with and how would you like your complaint resolved.

11.1 Complaints process

We will endeavour to acknowledge receipt of the Privacy Complaint Form within five business days of receiving it and to complete our investigation into your complaint in a timely manner. This may include, for example, gathering the facts, locating and reviewing relevant documents and speaking to relevant individuals.

In most cases, we expect that complaints will be investigated and a response provided within 30 days of receipt of the Privacy Complaint Form. If the matter is more complex and our investigation may take longer, we will write and let you know, including letting you know when we expect to provide our response.

Our response will set out:

- whether in the Privacy Officer's view there has been a breach of this Privacy Policy or any applicable privacy legislation; and
- what action, if any, PSA will take to rectify the situation

If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner or, in some instances, other regulatory bodies, such as the Victorian Health Services Commissioner or the Australian Communications and Media Authority.

12. Further information

Please contact PSA if you have any queries about the personal information that PSA holds about you or the way we handle that personal information. Our contact details for privacy queries are set out below.

Privacy Officer

Pharmaceutical Society of Australia
PO Box 42
DEAKIN WEST ACT 2600
Australia

E: privacyofficer@psa.org.au

P: + 61 02 6283 4746

F: +61 02 6285 2869

13. Changes to this policy

We may amend this Privacy Policy from time to time. The current version will be posted on our website and a copy may be obtained free of charge from our Privacy Officer.