

Privacy Policy

December
2023

This privacy policy sets out how the Pharmaceutical Society of Australia Ltd handles particular types of information.

1. About this Policy

The Pharmaceutical Society of Australia Ltd ACN 008 532 072 (PSA) is committed to best practice in managing and protecting the privacy of information gathered from members and non-members in all dealings ensuring the security of information maintained within the organisation.

By providing information to PSA, you consent to the collection, use and disclosure of the information in the manner described in this Privacy Policy.

We collect information from members and non-members to manage our relationship, communicate with you effectively, and identify which of our functions and activities best suit your needs.

The PSA complies with the requirements of the Australian Privacy Principles (APPs) set out in the Privacy Act 1988 (Cth) as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Act) and obligations of confidentiality in managing the collection, use, storage, and disclosure of your information (including any sensitive information), as well as in managing how individuals may access and seek to correct their information, including any information, which we hold.

2. Collection of Information

2.1 Types of Information

The types of information that the PSA collects about you will ultimately depend on the types of interactions that you have with us. The PSA typically collects some or all of the following information, which may include:

- general information about you, including your name, address, contact phone number, gender, date of birth, and email address;
- your employment details;

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- details of your professional qualifications and registration details with AHPRA;
- details around the size, setup and scope of services of your pharmacy;
- your training records;
- your payment details;
- your dietary and accessibility requirements; and
 details about our interactions with you – such as your membership details, any feedback, complaints, responses to surveys, records of correspondence and interactions with our staff (including in person, online, by telephone, email and via social media).

If you have enrolled in an RTO course, your training activity data is collected and held as part of your student records. We will collect and verify your USI before issuing the course qualification or statement of attainment.

2.2 Sensitive Information

Sometimes, we may need to collect sensitive information about you, for example, to handle a complaint. This might include information about your health, racial or ethnic origin, political opinions, association memberships, religious beliefs, sexual orientation, criminal history, and genetic or biometric information.

2.3 How Information is Collected

The PSA's usual practice is to collect information directly from you or your authorised representative.

We collect information in several ways, including:

- by email,
- over the telephone;
- through written correspondence;
- through the completion of forms;
- you access our products and services;
- in person interactions with you;
- through our website or social media;
- at seminars, events and functions;
- from third parties, such as our service providers and suppliers;
- during examinations and assignments conducted as part of our educational programs;
- electronic systems such as Applications; and
- through surveillance cameras (which we use for security purposes).

2.4 Indirect collection

While handling an investigation or resolving a complaint, we may collect information about you indirectly from publicly available sources or third parties such as an authorised representative, complainants, respondents, or witnesses to a complaint. We also collect information from publicly available sources to enable us to contact stakeholders who may be interested in supporting our work or participating in our events.

3. How Information is Used

The PSA requires your information to perform its core functions to provide services and benefits to its members and the pharmacy sector more generally. The PSA only collects information for purposes directly related to our functions or activities and only when necessary for or directly related to such purposes. We collect, hold, use and disclose your information to deliver our products and services to you, including:

- verifying your identity and processing payments if applicable;
- providing membership services;
- conducting professional development, educational and training courses;
- holding events such as conferences and briefings on current issues;
- policy activity and making submissions to government and others about improving laws and practices;
- delivering more relevant advertising based on your interests and experiences;
- providing member and customer support, including responding to queries.

If we do not collect your information, we may be unable to provide you with some or all of our products and services.

If possible, we will allow you to interact with us anonymously. However, we usually need your name and contact information for most of our functions and activities to handle your query, application, attendance, or complaint.

We may also use your information for the following purposes:

3.1 Membership administration and management activities

to fulfil administrative functions associated with membership, including:

- informing prospective members, members and non-members about membership benefits and services;
- processing membership applications and renewals;
- conducting customer satisfaction, market research and surveys;
- conducting competitions;
- managing and coordinating PSA elections;
- investigating and resolving complaints about members; and

- conducting business analysis, organising and managing data, and reporting statistical information about the PSA's functions and activities.
- to populate and manage our customer relationship management tool and maintain contact lists (including address, email and phone number) of individuals who may have an interest in pharmacy, are involved in pharmacy and/or a media representative with an interest in the pharmacy sector; and
- receiving services from third-party organisations.

3.2 Advocacy and policy advice

- to liaise with members, non-members, prospective members, individuals, Australian State and Territory Government agencies and private sector organisations for advocacy on behalf of our members or the community pharmacy sector generally;
- to compile statistics, analyse trends, undertake research, conduct consultations, provide advice and issue guidance;
- to correspond with persons and stakeholders who have an interest in health policy and issues affecting the pharmacy sector;
- to consult with members, non-members and stakeholders who the PSA reasonably believes would want to be consulted about an issue;
- to research, analyse and advocate on policy issues relating to the pharmacy sector; and
- to record details of your communication and educational activities, such as contact with the media, speeches, event management, surveys and publication preparation.

3.3 Programs and services

Administration and management of the following:

- programs related to the Australian Government and/or State and Territory Governments; and
- vaccination programs for corporate and government clients managed by the PSA.

3.4 Training and events

- to record events attended by PSA representatives and contacts made at such events;
- information and training activity data for statistical, regulatory and research purposes;
- as part of the enrolment procedure for RTO courses, PSA collects and verifies a Unique Student Identifier (USI) for each student to use in credit transfer requests to confer a course qualification or statement of attainment and to fulfil reporting requirements to the National Centre of Vocational Education Research (NCVER) and other agencies;
- under the Intern Training Program (ITP), information is disclosed to third parties in line with the ITP Agreement to eTG and eMIMs to enable access to products for interns. PSA may also disclose this information to the Pharmacy Board of Australia, the Australian Pharmacy Council and their preceptor as part of PSA's ITP accreditation requirements;

- as part of hosting or providing CPD activities for a third-party;
- 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 biographies;
- developing, administering, supporting and evaluating PSA's educational programs; and
- developing new public practice resources and services.

3.4 Professional conduct

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

3.5 General administration

PSA also collects, holds, uses and discloses information for general administration purposes:

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

4. Collection of information through our website

We collect information when you visit our website. This may include information you provide online, such as your name, address and email.

We may also collect information related to your mobile device, your device's unique identifier, your mobile network information, the type of mobile browser you use and information about the way you use our products, services or apps.

We use web analytics to collect a range of information about your interactions with our website. Web analytics software collects the information using first and third-party cookies and JavaScript. Our web analytics software allows us to collect your IP address, domain name, date and time of visit, the pages visited, and time spent on each page, whether you have visited the site before and what site referred you to the web page.

We use Google Analytics and behavioural marketing tools to build and score a profile that influences what marketing you may receive. We use this information to evaluate the effectiveness of our websites and the level of interest in particular pages or the PSA's campaigns.

We use web analytics to collect information from the browsers of those who use our websites or participate in the PSA LinkedIn group. If you participate in our social media sites, such as LinkedIn, we may keep a note of the discussion and store it against any membership or other profile we have created about you.

Our websites, including social media sites, contain links to other third-party websites. Your use of these sites is subject to third-party privacy policies.

4.1 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.

PSA uses online behavioural advertising to optimise email campaigns based on audience behaviour, e.g., reaction or no reaction to a campaign.

5. Disclosure of information

The PSA only uses information for the purposes for which it was given to the PSA or for purposes that are related to one of the PSA's functions or activities. The PSA does not provide your information to other organisations, government agencies, or anyone else without your informed consent unless one of the following exceptions applies:

- we believe you would reasonably expect, or have been told, that information of that kind is usually passed to those individuals, bodies or agencies;
- the disclosure will prevent or lessen a serious and imminent threat to somebody's life or health; or
- the disclosure is otherwise required or authorised by law.

You acknowledge that where we disclose your information to a third-party service provider, that third-party service provider may, in turn, use or disclose your information as is authorised or required by law.

5.1 Direct Marketing

We may use the information of members and non-members, specifically your name and relevant contact details, to inform you 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 various 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 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, 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 information to contact you with information about PSA and our current and future membership benefits.

5.2 Third parties

Information may be disclosed to third parties, such as the below:

- 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 who support PSA business processes and comply with Australian Privacy Standards;
 - 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 information to the service provider, and the service provider may, in turn, provide us with information collected from you while providing the relevant products or services.

PSA is obliged to report to the government and other bodies on the services they fund us to provide. Reports cover only demographic and service use information and will not contain identifying information.

6. Data quality and security

We hold information in several ways, including electronic databases, email contact lists, and paper files 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 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 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 informing us about any changes to your information, such as your email address or phone number. If you are a member, you can continuously review and update your information through your member login.

6.1 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 information.

6.2 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 protect payment details.

6.3 Website security

PSA strives to protect the information and privacy of website users. However, 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 online, contact PSA by telephone or post.

You can also help protect your information's privacy by keeping passwords secret and 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.

6.4 Third party websites

Links to third party websites not operated or controlled by PSA are provided for your convenience. PSA is not responsible for those websites' privacy or security practices, which this Privacy Policy does not cover.

7. Cross-border disclosure of information

7.1 Conferences

PSA may disclose 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.

7.2 Information and Communications Technology

PSA utilises cloud-based programs for activities such as event ticketing processes, membership databases, email broadcasts and surveys, which may be hosted offshore. Where information is held offshore, PSA makes every reasonable attempt to ensure that the hosting organisation abides by the APPs and that the hosting organisation does not use the information. information is only hosted offshore for the purpose it was collected, and PSA retains control of the data. As such, you acknowledge that your information may be disclosed to international parties.

8. Use of government-related identifiers

PSA's policy is to not:

- use a government-related identifier of an individual (such as a Medicare number, USI or driver's licence number) as our identifier of individuals or
- otherwise use or disclose such a government-related identifier unless 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).

9. Access to and correction of Information

The PSA takes reasonable steps to keep the information it collects accurate, up-to-date and complete. These steps include maintaining and updating information when the PSA is advised by individuals that their information has changed and at other times as necessary.

If you request access to the information that we hold about you or request that we change that information, the PSA will allow access or make the requested changes unless the PSA considers there is a sound reason under the Privacy Act or other relevant law to withhold the information, or not make the requested change. Please contact us at the details below to correct and update your information.

If we refuse your access or correction request, we will provide you with a written notice stating the reasons for our refusal and how you can make a complaint to the Office of the Australian Information Commissioner.

10. Making a complaint about the handling of your information

You may contact us anytime with any questions, concerns or complaints about this Privacy Policy or how your information is handled. Please address any complaint about privacy to the Privacy Officer via:

- email to: privacy@psa.org.au;
- phone our reception on 1300 369 772; or
- mail to: Privacy Officer, Pharmaceutical Society of Australia, PO Box 42, DEAKIN WEST ACT, 2600, Australia.

We take all complaints seriously and will respond to your complaint within a reasonable time.

If you are unsatisfied with our complaint handling, contact the Office of the Australian Information Commissioner (OAIC). The OAIC can be contacted by telephone on 1300 363 992, by email enquiries@oaic.gov.au or by using the contact details on the OAIC website.

11. Changes to this policy

We may amend this Privacy Policy from time to time to reflect our current data collection and disclosure practices, with or without notice to you. The most recent version of our Privacy Policy is available on our website. We recommend you visit our website regularly to keep updated with any changes to this Privacy Policy.