

Privacy Policy

September
2026

This privacy policy sets out how the Pharmaceutical Society of Australia Ltd ACN 008 532 072 (PSA, we and us) manages personal information.

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1. About this Policy

PSA is committed to best practice in managing and protecting the privacy of information gathered from members and non-members in all dealings and ensuring compliance with the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**), as amended from time to time.

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.

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;

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- your employment details;
- details of your professional qualifications and registration details with the Australian Health Practitioner Regulation Agency (Ahpra);
- your professional role or place of practice;
- details around the size, setup and scope of services of your pharmacy;
- your areas of practice, professional interests, career pathways, topics of interest, and participation in our Communities of Special Interest
- your training records;
- recordings of your telephone calls with us, and any notes or transcripts made from them;
- your payment details;
- photographs or video recordings, during events or functions;
- your dietary and accessibility requirements; and
- details about our interactions with you – such as 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).

Some of this information (your name, address and any nominated email address) may form part of PSA's register of members, which we are required by law to keep and which may be disclosed in limited circumstances — see section 5.3.

If you have enrolled in a registered training organisation (RTO) or similar course, your training activity data is collected and held as part of your student records. We will collect and verify your unique student identifier (USI) before issuing the course qualification or statement of attainment.

2.2 Sensitive Information

Sensitive information is personal information that receives extra protection under the Privacy Act. We only collect it where it is reasonably necessary for our functions or activities, and otherwise in accordance with the Privacy Act. Sensitive information we may collect includes:

- Health information: for example, when assessing eligibility for certain membership categories, arranging for someone to act on your behalf, or meeting dietary or accessibility needs at events.
- Racial or ethnic origin: for example, when you elect to tell us that you identify as Aboriginal or Torres Strait Islander. Providing this is voluntary.
- Membership of a professional or trade association: for example, where you include post-nominals or other affiliations in your member profile.

We do not intentionally collect information about political opinions, religious beliefs, sexual orientation, or genetic or biometric information. Some information you give us, such as dietary requirements, may indirectly reveal this type of information. Where it does, we treat it as sensitive information and only use it for the purpose you provided it.

If you give us sensitive information we have not asked for, we will only keep it if it is reasonably necessary to help you. Otherwise, we will destroy or de-identify it in accordance with our legal obligations.

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, including where the call is recorded (we will notify you at the start of the call where recording occurs);
- through written correspondence;
- through the completion of forms;
- when you access our products and services;
- in-person interactions with you, including when you attend our seminars, events and functions;
- through our website or social media;
- from third parties, such as our service providers and suppliers (including photographers, videographers, etc.);
- 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
- through automated tools or systems such as customer-relationship-management (CRM) platforms, learning-management systems or analytics tools used by PSA.

2.4 Indirect collection

While handling an investigation, resolving a complaint or performing our other functions, we may collect information about you indirectly from publicly available sources or third parties (such as an authorised representative, complainants, respondents, or witnesses) as well as from media monitoring services, social media, and other public sources. This may include information relevant to pharmacy coverage, assessing the suitability of individuals proposed for ambassador, spokesperson, or representative roles, and identifying and contacting stakeholders relevant to our advocacy, events, or work.

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;
- creating and distributing publications, advocacy materials, submissions, media and social media content, including (where you have consented) content featuring your image, name or comments;
- delivering more relevant advertising based on your interests and experiences; and
- 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.

Where it is lawful and practicable, you can deal with us anonymously or by using a pseudonym, for example when making a general enquiry. 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 use personal information only where it is *fair and reasonable in the circumstances* and retain it only for as long as required to fulfil the purpose for which it was collected, or to comply with legal, regulatory or contractual obligations, after which it is securely deleted or de-identified.

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;
- conducting business analysis, organising and managing data, and reporting statistical information about the PSA's functions and activities;

- populating and managing our customer relationship management tool and maintaining contact lists (including address, email and phone number) of individuals who may have an interest in pharmacy, are involved in pharmacy and/or are a media representative with an interest in the pharmacy sector;
- receiving services from third-party organisations;
- ensuring appropriate security and confidentiality controls are maintained for member information; and
- assessing and improving our products, services, systems and engagement strategies.

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 whom 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;
- to record details of your communication and educational activities, such as contact with the media, speeches, event management, surveys and publication preparation; and
- to prepare anonymised or aggregated reports that do not identify individuals but inform PSA's research, policy and advocacy work.

3.3 Programs and services

To administer and manage the following:

- programs related to the Australian Government and/or State and Territory Governments;
- grants or partnerships delivered under contract with government or other funders; and
- reporting of de-identified data as required by funding or accreditation arrangements.

3.4 Training and events

To undertake training and events activities, as outlined below:

- 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;
- developing, administering, supporting and evaluating PSA's educational programs;
- administering government-funded or subsidised education, training and workforce development programs, including reporting participant enrolment, progression, completion and outcomes to funding bodies where required under funding agreements;
- developing new public practice resources and services;
- evaluating participant satisfaction and improving course quality using feedback and analytics; and
- maintaining secure digital records in accordance with PSA's data-retention and destruction policy.

3.5 Professional conduct

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

3.6 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;
- using aggregated information for business analysis;
- conducting system maintenance, security monitoring and internal auditing; and
- using de-identified or anonymised information for service improvement and statistical purposes.

3.7 Automated Decision-Making and AI Systems

PSA uses some automated & AI-enabled tools that may process personal information, including:

- meeting transcription & summary tools;
- workplace productivity assistants;
- features built into our internal and external business systems, such as our recruitment platform;

- analytics to help us plan services and resourcing.

AI may be used to assist us with decisions about membership eligibility, fees, or whether a job application progresses. Where this occurs:

- the kinds of personal information used may include your contact details, membership and payment history, professional registration and qualifications, and information in your job application;
- no decision that could significantly affect you is made solely by a computer program; and
- a person reviews the output of the tool, can disregard or change it, and makes the final decision.

We review and manage these tools in line with this Policy & PSA's internal AI governance arrangements. If a computer program comes to make, or substantially assist in making, decisions that could significantly affect you, we will update this policy to describe the kinds of personal information used and the kinds of decisions made.

4. Collection of information through our website

We may collect information when you visit our website or use our online services, including through cookies and analytics tools (such as Google Analytics and Meta Pixel).

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.

You may manage or turn off non-essential cookies through your browser or our online cookie-consent tool.

We use web analytics and similar tools to collect a range of information about how visitors interact with our website and digital services. These tools may collect information such as your IP address, domain name, browser type, date and time of visit, pages viewed, referring website, and the time spent on each page. This information helps PSA understand usage patterns and improve the design and functionality of our digital platforms.

We may use tools such as Google Analytics, Meta Pixel, and other digital marketing platforms to measure engagement and improve our communication with members and users. With your consent, these tools may personalise marketing content or measure the effectiveness of advertising campaigns.

If you engage with PSA through social media (for example, LinkedIn, Facebook, or Instagram), we may collect information about your interactions for communication and engagement purposes. Where you apply to join a PSA-managed online community or group, we may ask you to answer membership or eligibility questions. We use your responses to verify your eligibility to join and retain them in accordance with this Policy. This information is managed in accordance with this Privacy Policy and the terms of the relevant social-media platform.

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. Some cookies used by PSA are necessary for core website functionality. In contrast, others (such as analytics and advertising cookies) are used to help us understand visitor behaviour or improve your experience. These may identify returning users who log into the website.

PSA uses online behavioural advertising to optimise email campaigns based on audience behaviour (e.g., whether you react to a campaign). We only conduct targeted advertising or email optimisation where you have provided consent, and you may opt out of such communications at any time.

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. We also provide information to service providers who host, operate or support our systems and services (for example, our customer relationship management platform and our publishing and communications partners).

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 is necessary to prevent or lessen a serious threat to the life, health, safety or welfare of any individual, or to public health or safety; or
- the disclosure is otherwise required or authorised by law.

Our service providers may only use your information to provide services to PSA, and not for their own purposes, unless they are required or authorised by law to do otherwise.

We take reasonable steps to ensure that such third parties are bound by confidentiality and privacy obligations consistent with the Australian Privacy Principles or equivalent standards.

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, but only where we have your prior consent or where an exception under the Privacy Act applies. 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 other digital platforms.

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

- if you are a member:
 - our member publications and events;
 - our Member Benefits program and other program offerings; and
 - the availability of goods, facilities and services in categories of business products and services we may offer from time to time, including credit cards and associated rewards, banking and financial services, insurance, telecommunications, travel and leisure, news publications and subscriptions, technology, lifestyle offers and support services;
- 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.

You may opt out of receiving marketing communications at any time by following the unsubscribe instructions included in our communications or by contacting PSA directly. We will action all opt-out requests promptly and without charge.

5.2 Third parties

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

- 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, where you have consented to them contacting you about their products and services;
- members of PSA Branch committees, advisory committees and other PSA groups, where the information is reasonably necessary for the performance of their role and subject to confidentiality obligations;

- government and regulatory bodies (such as the Department of Home Affairs, Australian Education International and the Department of Employment and Workplace Relations) 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);
- PSA's contracted service providers, including information technology service providers who support PSA business processes (including cloud-hosting and data-storage providers that may store information in Australia or other approved jurisdictions) and offshore staffing and contractor service providers who deliver operational support services to PSA;
- 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.

All contracted service providers are required to handle personal information in accordance with this Privacy Policy and the Australian Privacy Principles, and PSA maintains oversight through contractual and technical controls.

PSA may provide reports to government and other funding bodies about the services they fund us to provide. These reports contain only aggregated or de-identified information and do not include personal identifiers.

5.3 Register of members

As a public company limited by guarantee, PSA is required under the *Corporations Act 2001* (Cth) to keep a register of members. The register records each member's name, address and the date their membership commenced. Where a member nominates an email address as an address for communications with us, that email address may also form part of the register.

Any person may inspect the register and may request a copy of it. A person requesting a copy must state the purpose of their request, and we must not provide a copy where the stated purpose is not proper. It is an offence under the Corporations Act to use information obtained from the register improperly. We assess each request before releasing any information.

This disclosure is required by law and does not depend on a member's consent.

6. Events

PSA may collect personal information in the form of photographs, video or audio recordings at PSA and PSA-affiliated events. This material is used to document events, report to members and stakeholders, promote PSA activities, and publish content in print or digital media.

Where these events involve external partners, venue providers or other organisations that conduct their own photography or recording, attendees will be notified of the involvement of those third parties and the purposes for which those third parties may collect or use images. These parties are responsible for managing their own media in accordance with their privacy obligations.

Images and recordings collected by PSA will be stored securely and accessed only for the purposes outlined above and otherwise in accordance with this policy. PSA retains event media in line with its records management practices and takes reasonable steps to protect files from unauthorised access, modification, disclosure or loss.

Where PSA jointly hosts an event and media is collected for shared purposes, PSA and its partners will agree on roles for storing, accessing and using images. Each organisation will otherwise manage its own copies of media under its privacy policy. Attendees may contact PSA about how event media is handled or to request access or correction where PSA controls the material.

7. 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.

We also protect electronic records through cybersecurity controls. We are progressively implementing a layered security approach including encryption, multi-factor authentication, access restrictions, and regular system monitoring. We intend to undertake periodic audits to assess and improve the effectiveness of these controls (including as they are implemented).

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.

We retain personal information only for as long as it is required for our business purposes or legal obligations and then securely delete or de-identify it.

7.1 Information and Communications Technology (ICT) Security

PSA maintains ICT security measures, including firewalls, anti-virus software and login and password protection to protect your information. PSA is working toward strengthening these controls with enhanced encryption, secure office access protocols, and personnel security measures and training.

PSA maintains a data breach response plan aligned with the Notifiable Data Breaches scheme under the Privacy Act, and is developing more detailed cyber incident response procedures. If an eligible data breach occurs, PSA will notify the Office of the Australian Information Commissioner (OAIC) and affected individuals as soon as practicable, in accordance with the Notifiable Data Breaches scheme.

7.2 Payment security

PSA processes assessment, membership and other payments using EFTPOS and online technologies. PSA's policy is that all transactions are processed in accordance with Payment Card Industry Data Security Standards (PCI DSS).

Payment information is transmitted using industry-standard encryption [Transport Layer Security (TLS)] and stored only as long as necessary to complete the transaction. PSA does not retain full credit or debit card details after payment is processed.

7.3 Website security

PSA strives to protect the information and privacy of website users. We take reasonable technical and organisational steps to protect information you provide online. However, no internet transmission is completely secure, so we encourage you to contact us if you have concerns about sending information online.

If you are concerned about sending your information online, contact PSA.

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

If you suspect unauthorised use of your PSA login or believe your account security has been compromised, you should immediately notify us so that we can take appropriate action.

7.4 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, and this Privacy Policy does not apply to those external sites. We recommend you review the privacy policy of any third-party site you visit before providing personal information.

8. Cross-border disclosure of information

8.1 Conferences

PSA may disclose personal information to third parties located overseas if you attend a PSA conference, seminar or event offshore. This may include providing necessary details to PSA sponsors, industry bodies with whom PSA has a recognised agreement, and academic institutions supporting the event.

Such disclosures will be limited to the minimum information required for event participation and conducted in accordance with this Privacy Policy.

8.2 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. Our cloud and hosting providers may store or process personal information in Australia, the United States, Singapore, the Philippines and the European Union. PSA takes reasonable steps to ensure that any overseas recipient:

- is subject to contractual and technical safeguards that require compliance with the Australian Privacy Principles or equivalent data-protection standards; and
- only handles the information for the purpose for which it was collected and under PSA's direction and control.

PSA retains overall control of all information stored in offshore systems and does not authorise overseas recipients to use the information for their own purposes.

8.3 Offshore Staffing and Operational Support Providers

PSA may disclose personal information to offshore staffing and contractor service providers who provide operational support services to PSA. These providers may access, handle and process member data as part of delivering their contracted services.

Before disclosing personal information to these providers, PSA takes reasonable steps to ensure that the overseas recipient handles the information in accordance with the Australian Privacy Principles. The categories of personal information disclosed to offshore staffing providers are limited to what is reasonably necessary to provide the contracted services, and access is subject to confidentiality obligations, pre-employment screening, and information security controls.

9. Use of government-related identifiers

PSA's policy is not to:

- collect or 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).

Where PSA is required to collect a government-related identifier, for example, to verify qualifications, training records, or identity for regulatory compliance, we will only do so to the extent necessary for that lawful purpose. Any such identifiers are stored securely, access is restricted, and they are not used for unrelated purposes.

PSA ensures that any use or disclosure of government-related identifiers is fair and reasonable in the circumstances and consistent with the Australian Privacy Principles.

10. 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 get in touch with us at the details below to correct and update your information.

You may also request that PSA destroy or de-identify personal information that is no longer required for lawful purposes or request an explanation of any decision that has been made about you through automated means, where applicable. PSA will respond to all access, correction or deletion requests within a reasonable time (generally within 30 days) and in the manner you request, where it is reasonable and practicable to do so.

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.

If your request relates to destruction, de-identification or automated-decision information and we are unable to comply, we will explain the lawful basis for our decision.

11. 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 complaints about privacy to the Privacy Officer via:

- Email: privacy@psa.org.au;
- Phone: 1300 369 772; or
- Mail: 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 not satisfied with our response or the way we have handled your complaint, you may 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.

12. Changes to this policy

We review this Privacy Policy regularly, and whenever there are significant changes in our operations, technology, or the law. Any updates will be published on our website and will include the effective date.

The version currently in force was last reviewed in September 2026.

We encourage you to check our website periodically to stay informed about how we protect your privacy.