

PRIVACY POLICY

Policy number	3.11	Version	2022v4
Responsible Person	CFOO	Approval date	17-03-2022

INTRODUCTION

Set out below is ASHM's Privacy Policy as it appears on ASHM website, as follows:

<https://www.ashm.org.au/privacy/>

PURPOSE

The purpose of this policy is to ensure that ASHM adheres to the requirements set out in the **Privacy Act 1988** and the **Australian Privacy Principles**, which govern standards, rights, and obligations for the collection, use and disclosure of personal information.

The purpose of this policy is to inform:

- all ASHM employees
- volunteers, consultants, and representatives,
- independent contractors and job applicants, as well as
- individuals who provide ASHM with their personal information

of their rights and responsibilities concerning the uses of personal information.

DEFINITIONS

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

(Privacy Act 1988, Registered 25 October 2021)

POLICY

About ASHM's Privacy Policy

ashm.org.au

ASHM Health

Level 3, 160 Clarence Street, Sydney NSW 2000 T +61 02 8204 0700 F +61 02 8204 0782

ABN 48 264 545 457 CFN 17788



The Australasian Society for HIV, Viral Hepatitis and Sexual Health Medicine (ASHM) is bound by the Privacy Act 1988 (Cth) and is committed to complying with the Act, including the Australian Privacy Principles, and to protecting the privacy of the personal information that ASHM holds.

This policy applies to all ASHM employees, volunteers, consultants and representatives, independent contractors and job applicants, as well as individuals who provide ASHM with their personal information.

If ASHM decides to change this Privacy Policy, we will post those changes to:

- the relevant page on our website: www.ashm.org.au
- other websites that ASHM manages and is responsible for
- alert our members, if necessary, in cases where those changes might also affect their membership.

Your right to access and inspect and, where necessary, correct or remove, the personal information that ASHM holds about you

We will take all reasonable steps to ensure that the personal information that we hold is accurate and up to date. If you feel that information about you is not accurate or your details have or are about to change, you can:

- call us on 02 8204 0700 and we will correct or update your personal information
- if you have a login to MyASHM at <http://www.ashm.org.au> then you can click on Update My Details to change your details, when you are logged in.

If you are unable to access via MyASHM please call ASHM on 02 8204 0700, or email privacy.officer@ashm.org.au to request access to the records you hold.

You have a right to access your personal information, subject to certain exceptions provided for in the Privacy Act. For security reasons, you will be asked to put your request in writing and provide proof of your identity.

All requests to amend or otherwise update information we hold about you will be performed as soon as practically possible.

All requests to remove information we hold about you, or to restrict the way in which ASHM processes your data, will be performed as soon as practically possible, although this may impact ASHM's ability to communicate with you and provide its suite of services.

Your right not to provide personal information to ASHM

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You are not obliged to give us your personal information. If you would like to access any of our services on an anonymous basis, we will take all reasonable steps to comply with your request. However, if you choose not to provide ASHM with personal details, such as your name or address, the range of options available to you or your organisation, may be limited.

For example, in the case of anonymity, ASHM cannot provide the full range of member services or allow you or your organisation to participate in networking functions, seminars and events, or successfully deliver any products and services that you have ordered from the ASHM website.

Your right to have your privacy complaints investigated and resolved.

If you have a complaint about ASHM's privacy practices, including a perceived breach of the Australian Privacy Principles, please contact our Privacy Officer: privacy.officer@ashm.org.au

If the Privacy Officer is not able to satisfactorily address your concerns, then please refer to www.ashm.org.au/about/ for information about ASHM's general complaint handling process.

Complaints will be handled in accordance with ASHM's Complaints Policy, which is available on the ASHM website. You can request a copy of this policy from us at any time during business hours (9:30am to 5pm AEST).

This Privacy policy was last updated on March 2022. This policy will be reviewed every two years and after any changes to the **Privacy Act 1988** and the **Australian Privacy Principles**.

RELATED POLICIES

- 2.01 Conflict of Interest Policy
- 2.13 Code of Conduct
- 3.05 Delegations Policy
- 3.14 Confidentiality Policy

AUTHORISATION

ASHM Board

HISTORY

Version	Approved Date	Comments/ Amendments
2018v1	21-06-2018	First version
2020v2	28-10-2020	The policy was updated as per the changes in the Australian Privacy Principles
2021v3	N/A	New template
2022v4	17-03-2022	Policy updated and compliance reviewed in line with Privacy Act amendments

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PRIVACY PROCEDURE

Procedures number	3.11	Version	2022v4
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INTRODUCTION

This Privacy Procedure explains:

1. How to contact ASHM
2. When and how does ASHM collect personal information
3. What personal information does ASHM collect
4. How ASHM uses your personal information
5. Disclosure of information, including any transfer of information internationally
6. How ASHM stores and secures information that it collects
7. Use of Cookies.

RESPONSIBILITIES

The Chief Financial and Operations Officer acts as the ASHM Privacy Officer.

It is the responsibility of the HR Manager to ensure that ASHM staff induction includes the Privacy Policy and Procedure.

It is the responsibility of all ASHM employees, volunteers, consultants and representatives to familiarise themselves with this policy and to see that it is adopted in practice.

PROCEDURES

1. How to contact ASHM

ASHM is the data controller. If you would like more information on privacy or have any questions in relation to this policy please contact our Privacy Manager, who can be contacted by mail, telephone or email as follows:

ashm.org.au

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Mail:

ASHM

Level 3, 160 Clarence Street

Sydney

NSW 2000

Telephone: (02) 8204 0700

Email: privacy.officer@ashm.org.au

2. *When and how does ASHM collect personal information?*

Personal information is any information that can be used to identify a person no matter how it is collected or recorded. Examples of personal information are name, address, email address, phone number.

Personal information can be collected by ASHM at various times and from a variety of sources, including:

- when dealing with ASHM's members
- when dealing with registrants to education courses run by ASHM
- when dealing with registrants to conferences or events run by ASHM
- when undertaking ASHM marketing initiatives
- when recruiting new ASHM staff
- when dealing with individuals who are contacts of ASHM in another form from those listed above

Where possible, we collect your personal information directly from you. If you feel that the information that we are requesting, either from www.ashm.org.au, my.ashm.org.au, and from ASHM's subsidiary websites, on our forms, or in our discussions with you, is not information that you wish to provide, please feel free to raise this with us.

We collect information by phone, in writing (e.g. email, fax, letter), and electronically when you register for an event/course, order a resource, or become a member from our web site www.ashm.org.au or my.ashm.org.au. ASHM can also collect this information in the course of job interviews, telephone discussions, reference checks and in writing.

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In some circumstances, ASHM may obtain personal information from a third party. If you provide personal information about another person to ASHM, then ASHM requires that you inform that person you have done so and provide them with a copy of this policy, for example a student may be required to provide their supervisor's name and contact details.

We also collect personal information (including contact details) as part of our normal communication processes directly related to our purposes, including:

- when an individual emails staff members
- when an individual telephones us
- when an individual hands us their business card.

3. *What personal information does ASHM collect?*

When dealing with membership, fulfilling your registrations to a course, conference and events, ordering resources or purchasing other services, ASHM will collect at a minimum the following:

- name of the contact person or people from the relevant organisation
- the profession and position of the respective person or people
- business address and contact details, including phone number(s)
- gender
- nature of products or services being sought for the purposes of filling your order
- payment details by Credit Card, Invoice or direct debit
- your specific interests e.g. disease areas, that form part of ASHM's mission and range of services

For student memberships we also collect:

- supervisor's name
- supervisor's contact phone number
- supervisor's email address.

When dealing with independent contractors, ASHM collects the following:

- name

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- business address and contact details
- insurance details
- ABN if applicable
- rates and fees.

When dealing with job applicants, ASHM collects the following:

- name
- address/contact details
- occupation
- career history
- references.

4. *How ASHM uses your personal information*

We will use the information collected to provide membership, products, and services and may also use it for development of new resources, to conduct evaluations and for other marketing purposes.

Your personal information may also be used:

- to deliver the resources you requested
- to deliver information related to your course or conference registration
- to provide you with further information about the resources and services you requested
- to personalise and customise your experiences with ASHM
- to help ASHM manage and enhance its services
- to communicate with you
- for administration purposes, including charging, billing and collecting debts
- to promote and market other products and services of ASHM which we consider may be of interest to you

Information collected on contractors will be used to ensure that our independent contractors can

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perform work for ASHM in a safe and lawful manner.

Information collected from job applicants will be used to assess the suitability of applicants for a position. In the event that the job application is rejected, ASHM, with your consent, may keep the information to use in the event that another comparable vacancy arises.

We will not use your personal information for any purpose which is not related to the primary purpose for which it is collected.

We will not use your personal information for any purpose for which you would not reasonably expect us to use your personal information.

5. *Disclosure of information, including any transfer of information internationally*

We guarantee that we will not sell your personal information to any third party.

We do not give personal information about an individual to Government agencies, private sector organisations or anyone else unless one of the following applies:

- the individual has consented
- the purpose is funded by a Government agency or private sector information
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies e.g. RACGP, ACRRM
- it is otherwise required or authorised by law
- it will prevent or lessen a serious and imminent threat to somebody's life or health, or
- it is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.

For the purposes referred to in this policy, we may disclose your personal information to external organisations including our professional advisors, accountants, auditors and lawyers.

We also engage a third-party service to provide online credit card account processing and related services. When you pay your accounts online, a secure server is used. Paypal encrypts the information you send through this website.

ASHM uses encryption techniques wherever possible but makes no warranty in respect of the strength or effectiveness of that encryption and ASHM is not responsible or liable for events arising from unauthorised access of the information you provide.

We collect information globally and primarily store that information on the servers of third-party

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providers who could be in various countries around the world. We transfer, process and store your information outside your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the services. Whenever we transfer your information, we take steps to protect it.

If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your Personal Information to Australia, or wherever the servers of our third-party providers are located. By providing your Personal Information, you consent to any transfer and processing in accordance with this Policy.

6. *How ASHM stores and secures information that ASHM collects*

ASHM will take all reasonable steps to secure your personal information. Electronic information is protected by various security measures and access to information and databases is restricted to staff and officers of ASHM by network access controls including password protection, and physical security measures.

ASHM does not have any data stored on its own servers. ASHM engages with reputable providers such as Microsoft, to store all its data. Whilst ASHM has its own security protocols and processes, it is also reliant on those of third parties.

ASHM uses various scanning and virus protection techniques to protect the data it holds from malicious attacks.

7. *Use of cookies on ASHM's various websites*

We use Google Analytics to collect information about how people use this website. The information we obtain from Google Analytics is used to help us understand users' needs so that we can offer a better user experience and ensure that important information is reaching our target areas.

Google Analytics uses 'cookies' to collect information about which pages you visit, how long you are on the site, how you got there (for example from a search engine, a link, an advertisement etc.) and what you select. Information collected by the cookies (including your IP address) is transmitted to and stored by Google on servers in the United States.

By using the ASHM website and related resource-based websites, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie or use the opt-out service provided by Google.

When you use ASHM's main website (www.ashm.org.au) or any of our subsidiary websites (e.g. those promoting ASHM conferences), we collect information from you by using a feature of your browser

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called a cookie to assign your computer a "User ID". You may configure your browser so that you are notified before a cookie is downloaded. ASHM may use information contained in cookies to make assumptions about the user of the computer.

Our websites contain links to other sites. ASHM is not responsible for the content and the privacy practices of other web sites and encourages you to examine each site's privacy policy and make your own decisions regarding the accuracy, reliability and correctness of material and information found.

RELATED DOCUMENTS AND FORMS

Australian Privacy Principles

ASHM Privacy Manual 2020

AUTHORISATION

ASHM CEO

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