



AUSTRALIAN DENTAL ASSOCIATION VICTORIAN BRANCH INC.

BRANCH POLICY STATEMENT 01.02

PRIVACY

1. INTRODUCTION

- 1.1 The Australian Dental Association Victorian Branch Inc. (ADAVB or the Branch) is the professional association for Victorian dentists and dentist students which is committed to the oral health of all Victorians and the professional lives of its members.

The ADAVB is a peak professional body, delivering a range of services and projects to: support members; promote dental health and services; support research into dentistry and oral disease; engage with the State Government; and in liaison with the ADA Inc., engage with the Federal Government, to better address the delivery of dental care.

It is a formally recognised Branch of the Australian Dental Association Inc. (ADA), and members of the ADAVB are also members of the ADA federally.

- 1.2 The ADAVB is an association incorporated under the Associations Incorporation Act 1991 (Vic) – Reg'd Assoc. No. A0022649E. It is also registered with ASIC (Australian Registered Body Number ARBN 152948680).
- 1.3 This policy applies to the ADAVB. The ADA has a separate Privacy Policy, which is available on the ADA Inc website.
- 1.4 This policy sets out how the Branch will collect, use, store, disclose and de-identify personal information.

2. COMMITMENT TO PRIVACY

- 2.1 The ADAVB takes privacy obligations very seriously and wishes to ensure that all personal and sensitive information is dealt with in accordance with all relevant privacy laws and this privacy policy.
- 2.2 The ADAVB acts to comply with obligations under the Privacy Act 1988 (Cth) and comply with the Australian Privacy Principles, as well other relevant legislation, including the:
- Healthcare Identifiers Act 2010 (Cth);
 - Health Records Act 2001 (Vic); and
 - Spam Act 2003 (Cth).

3. THE TYPES OF INFORMATION COLLECTED

- 3.1 The type of personal information collected includes:
- Contact details (name, address, professional information, telephone numbers, email);
 - Demographic information (gender, date of birth);
 - Professional Information (Qualifications, Specialty, Continuing Professional Development);

- Activities (Participation in ADA, other dental and community activities and events, ADAVB Regional Group); and
 - Individual preferences, interests and behaviour relating to transactions, products and services, including ADAVB digital services.
- 3.2 The information collected includes records of communications, which may include, information personally provided or provided by third parties where authorised. This includes, but is not limited to, the following types of information:
- ADA membership status and practice information;
 - Personal financial information;
 - Personal credit card data, including where appropriate, credit history; and
 - Any idiosyncratic or personal information personally provided or provided by third parties.
- 3.3 ADAVB provides some services to members of ADATAs. To the extent required to supply those services, the same information collected about ADAVB members is also collected about ADATAs members, and this policy applies to ADATAs operations under these circumstances. The ADATAs also has its own Privacy Policy which is available upon request.
- 3.4 The ADAVB provides dispute assistance services to members, and acts as a corporate authorised representative of Guild Insurance Ltd, the underwriter of the ADAVB Indemnity Scheme, for purposes related to administration of member claims or notifiable circumstances. In this case, the ADAVB may collect and share with Guild Insurance Ltd and their legal representatives, the name and contact details of the relevant insured member, and any claim details, including patient/dental consumer information and if the consumer consents, details about their dental health and treatment. The Guild Insurance Ltd. Privacy Policy is available from its website.
- 3.5 The ADAVB provides secretariat support for the eviDent Foundation of which it is the sole member. The ADAVB acts on behalf of the eviDent Foundation to seek donations and to engage dental practices in practice-based dental research. The eviDent Foundation Privacy Policy is available from its website.
- 3.6 It is important that Members provide the ADAVB with current and accurate information so that the Branch can provide services effectively.
- 3.7 The ADAVB uses 24-hour surveillance devices in its offices for security purposes, and the building in which the ADAVB offices are situated also use surveillance devices at entrances and in car parks for the same reason. Notices disclosing surveillance appear in the main foyer and in the reception area of the ADAVB office.

3.8 All use of the Branch WIFI system is monitored for security purposes whether using a phone, laptop or tablet device. Logs are maintained of all network activity, and images of browsing sessions are captured whenever a page is visited for longer than 5 seconds, and these may be reviewed by the ADAVB or its service providers.

4. WHY PRIVATE INFORMATION IS COLLECTED

4.1 Private information is collected about members and others to enable communication, and educate in regard to the ADAVB organisation and its work.

4.2 The ADAVB does not use collected information in any way other than to achieve its objects and purposes.

4.3 The ADAVB might also use information for the following purposes:

- For the immediate reason for which it has been provided (for example, to enable the ADAVB to process requests, payments, registrations, subscriptions, access to or delivery of services, etc.);
- To maintain contact with correspondents about ADAVB's work, to report about ADAVB's work, or to encourage learning in regard to ADAVB;
- Any other purpose directly related to ADAVB work and for which consent has been provided (where it is reasonably required by law);
- To assess for ADAVB and external honours and awards; and
- To disclose contact details to the types of organisations with whom the ADAVB normally does business, including:
 - ~ Mailing houses for delivery of ADAVB or other dentally related publications;
 - ~ ADAVB Regional Group office bearers;
 - ~ Entities engaged by ADAVB to undertake surveys or to collect practice or other data;
 - ~ The eviDent Foundation; and
 - ~ Other organisations, with which the ADAVB has agreements for the delivery of specified services.

4.5 The ADAVB does not rent, sell or exchange information.

4.6 The ADAVB takes all reasonable steps to ensure that these organisations are in turn bound by confidentiality and privacy obligations when handling personal information.

4.7 The ADAVB will refrain from disclosure of personal information to another organisation, when requested at either the time information is collected or at any later time.

4.8 The ADAVB may be legally obligated to disclose information, for example, to government departments.

4.9 The ADAVB may share non-personal, non-sensitive and de-identified information with research organisations and with the ADA Inc.

5. HOW INFORMATION IS COLLECTED

5.1 The ADAVB may collect personal information either directly or from third parties. Information collected from third parties may be by formal or informal means.

5.2 When information is collected from third parties and it is not personal information that is contained in a Commonwealth record, reasonable steps will be taken to destroy or de-identify the information as required by law.

5.3 The ADAVB collects personal information about supporters, donors, volunteers, employees, contractors and visitors to our events. Information is collected by:

- Face to face contact;
- Electronically including through the website and online surveys;
- Via social media messages or conversation;
- During phone calls;
- Voice or image recordings;
- Whilst delivering and administering services; and
- From forms, coupons and other correspondence (both in writing and electronically).

6. USE OF INFORMATION

6.1 The ADAVB only uses personal and sensitive information for the purpose(s) for which it was collected as set out above, or as otherwise permitted by law.

7. ACCESSING AND CORRECTING PERSONAL INFORMATION

7.1 On request personal information can be accessed through the ADAVB member site using a confidential log in and password. Occasionally, access may be refused, for example, where granting access would infringe another individual's privacy.

7.2 On request for access to personal information, adequate identification will be required to ensure that privacy is protected.

7.3 A reasonable fee may be requested to cover the cost of access.

7.4 Questions about this privacy policy or for access to personal information, contact the ADA membership team on 03 8825 4600 or send an email (to ceo@adavb.org). The ADAVB aims to respond to requests within 28 days of receipt. A written explanation will be provided where a request cannot be met.

8. COMPLAINTS ABOUT A BREACH OF PRIVACY

8.1 For complaints regarding ADAVB collection or management of personal information please follow the procedure set out below;

- Contact the ADAVB Privacy Officer (the Chief Executive Officer), on 03 8825 4600 or ceo@adavb.org; and
- Complete the Complaints Form, see Appendix 1.

Note, in order to effectively address complaints, further personal information, information about the complaint and the reasons behind the submission may be required.

8.2 If a complaint remains unresolved, contact can be made with the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au/ . The OAIC is an independent government body. It has the power to investigate complaints about possible interference with privacy.

9. SECURING PERSONAL INFORMATION

9.1 The ADAVB takes reasonable steps to ensure the security of personal and sensitive information held and to protect it against loss, misuse or unauthorised access, destruction, modification or disclosure.

9.2 Only trained and authorised personnel are permitted to access these details. It is the ADAVB policy to:

- Permanently de-identify personal information where reasonable and possible; and
- Destroy personal information once there is no longer a legal or business need for retention.

10. ANONYMITY

10.1 Individuals have the right to be dealt with anonymously, provided that it is lawful and practicable.

10.2 The ADAVB will try to accommodate requests for anonymity wherever possible; however, in some circumstances, this may prevent practical and effective communication. In such cases, notification of this will be provided.

11. WEB PRIVACY

11.1 Refer to Appendix 2, ADAVB Web Privacy Statement.

11.2 Links to other websites

11.2.1 The ADAVB website may contain links to third party websites, and third party websites may also have links to the ADAVB website.

11.2.2 The ADAVB Privacy Policy does not apply to external links or other websites. The operators of other websites may collect personal information.

11.2.3 Individuals should read the privacy policies of any website they link to from the ADAVB website.

Branch Policy Statement Number	1.02
Adopted by Council	23 April 2014
Reviewed by Constitution and Policy Committee	23 June 2014 12 April 2018
Amended by Council	21 July 2014 7 May 2018
Relevant Rules	
Relevant By-Laws	
See also	Historical policy reference: 25/07, BPS 1.19 – Employee Disciplinary Policy, Staff Induction Notes

Appendix 1 ADAVB Privacy Complaint Form
Appendix 2 ADAVB Web Privacy Statement



AUSTRALIAN DENTAL ASSOCIATION VICTORIAN BRANCH INC. (ADAVB)

PRIVACY COMPLAINT FORM

INFORMATION FOR APPLICANTS

- Complaints should only be lodged by a complainant in writing if you have been unable to resolve your issue or concern informally.
- The ADAVB aims to provide you with an acknowledgment of your lodged complaint within three business days of the ADAVB having received your complaint/appeal.
- You may be asked for further information in relation to your complaint.
- ADAVB will endeavour to respond to your complaint within a reasonable timeframe, usually twenty-eight business days after the receipt of the written complaint and all further information in relation to it, or as soon as practicable. However, in some cases, particularly if the matter is complex, the resolution may take longer.
- Please complete all fields on this form.
- Please submit this form to ceo@adavb.org

PART A - APPLICANT DETAILS

Personal Details

Title: First Name: Surname:

Gender: Male Female

Date of Birth: ___/___/_____

Phone (Home): Mobile Phone:

Email address:

Preferred contact method and time (you must provide at least one contact method):

Home Address:

Street:

Suburb

Post Code

State Country

Postal Address (if different from Home Address):

Street

Suburb

Post Code

State Country

PART B - COMPLAINT DETAILS

Please provide details of the nature of your involvement with ADAVB Inc.

Please provide details of your complaint:

(If necessary attach an extra page to outline the details. Any supporting documentation should also be provided - copies required only)

Does your complaint involve behaviour by a particular staff member of ADAVB?

Yes

No

If so please provide the name of the staff member involved and any information about the staff member's involvement:

Name of staff member:

Nature of involvement:

Please provide details regarding how the complaint has affected you:

Please provide details in relation to how you became aware of the complaint:

Does your complaint require urgent attention?

Yes

No

Have you lodged a complaint about this issue before?

Yes

No

If yes, when

Have you reported your complaint to any other agency or organisation?

Yes

No

If yes, please specify which agency or organisation

What is your expected outcome?

Please sign and date this form:

Signature

Date:



ADAVB WEBSITE PRIVACY STATEMENT

The ADAVB has a Privacy Policy which applies to the ADAVB website and governs online data collection and usage. The Policy is available on this website. Use of the ADAVB website indicates acceptance of the data practices described in this statement.

Collection of Personal Information

ADAVB collects personally identifiable information, such as e-mail addresses, names, home or work address or telephone number. ADAVB also collects anonymous demographic information, which is not unique, such as post code, age, gender, preferences, interests and favourites.

Information about computer hardware and software used is automatically collected by ADAVB. This information can include: IP address, browser type, domain names, access times and referring website addresses. This information is used by ADAVB for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the ADAVB website.

Note, direct disclosure of personally identifiable information or personally sensitive data through ADAVB public electronic communication channels may be collected and used by third parties.

ADAVB encourages individuals to review the privacy statements of websites chosen to link to from the ADAVB website in order to understand how those websites collect, use and share information. ADAVB is not responsible for the privacy statements or other content on websites outside of the control of ADAVB.

Use of Personal Information

ADAVB collects and uses personal information to operate the ADAVB website and deliver the services requested. ADAVB also uses personally identifiable information to communicate about products or services available from ADAVB and its affiliates. ADAVB may also contact individuals via surveys to conduct research opinions of current services or of potential new services that may be offered.

ADAVB does not sell, rent or lease its customer lists to third parties. ADAVB may, contact individuals on behalf of external business partners about particular offerings that may be of interest. In such cases, unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, ADAVB may share data with trusted partners to: help perform statistical analysis; send email or postal mail; provide customer support; or arrange deliveries. All such third parties are prohibited from using personal information except to provide these services to ADAVB, and third parties are required to maintain the confidentiality of personal information.

ADAVB keeps track of the websites and pages individuals visit within ADAVB, in order to determine the most popular ADAVB services. This data is used to deliver customized content and advertising within ADAVB.

ADAVB will only disclose personal information collected via the website, without notice, if required to do so by law or in the good faith belief that such action is necessary to:

- conform to the edicts of the law or comply with legal process served on ADAVB or the site;
- protect and defend the rights or property of ADAVB; and,
- act under exigent circumstances to protect the personal safety of users of ADAVB, or the public.

Use of Cookies

The ADAVB website may use "cookies" to help personalise online experience. A cookie is a text file that is placed on the users hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses. Cookies are uniquely assigned, and can only be read by a web server in the domain that issued the cookie.

A primary purpose of cookies is to provide a convenience feature to save the user time. The purpose of a cookie is to tell the web server that the user has returned to a specific page. For example, if a user has personalised ADAVB pages, or registered with ADAVB site or services, a cookie can help ADAVB to recall specific information on subsequent visits. This simplifies the process of recording personal information, such as billing addresses, shipping addresses. On return to the same ADAVB website, the information the user previously provided can be retrieved, so improve use of website.

Individuals have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but this can usually be modified to decline cookies if preferred. Choosing to decline cookies, may affect the quality of experience and interaction with features of the ADAVB services or websites.

All visits to ADAVB website (www.adavb.net) are logged. The following data is supplied by the users browser:

- IP address and/or domain name;
- Operating system (type of browser and platform);
- The date, time and length of visits to the website; and
- The resources accessed and the documents downloaded.

This information is used to compile statistical information about the use of the website, and to inform ADAVB about member interests and preferences. If individuals do not want 'cookies' to be used, they should adjust browser settings to disable them.

Security of Personal Information

ADAVB secures personal information from unauthorised access, use or disclosure. When personal information (such as a credit card number) is transmitted to other web sites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

Changes to this Statement

ADAVB will occasionally update this Website Privacy Statement to reflect organisation and user feedback. ADAVB encourages individuals to periodically review this Statement to be informed of how ADAVB is protecting personal information.

Contact Information

ADAVB welcomes comments regarding this Website Privacy Statement. If individuals believe that ADAVB has not adhered to this Statement, they should contact ADAVB at ask@adavb.net. All reasonable and practicable efforts will be used to promptly determine and remedy the problem.