

Policy No:EP0010Issue Date:Mar 2015Review Date:Mar 2018

Purpose

1. The purpose of this policy is to describe how eviDent will collect, use, store, disclose and de-identify your personal information.

Scope

- 2. This policy applies to eviDent staff, Board and Committee members, members of the eviDent Dental Practice Based Research Network, sponsors, donors and benefactors, research and business affiliates, stakeholders and organisations who provide funding to eviDent or any of its' research projects.
- 3. Participants in eviDent's research projects are not subject to this Policy because the terms under which their personal information is collected, stored and used is determined by the Human Research Ethics approval for the relevant eviDent project(s) in which they take part. eviDent project participants who wish to discuss the collection and use of their personal information are advised to contact that project's Chief Investigator.

Relevant legislation

For the purposes of this policy, the following definitions are used:

- 4. When dealing with your personal information we observe our obligations under the Privacy Act 1988 (Cth) and comply with the Australian Privacy Principles, as well other relevant legislation, including the:
 - a. Healthcare Identifiers Act 2010 (Cth);
 - b. Health Records Act 2001 (Vic); and
 - c. Spam Act 2003 (Cth)

The types of information we collect

- 5. The types of personal information we collect include:
 - a. Contact details (name, address, professional information, telephone numbers, email, etc); and
 - b. Demographic information (gender, date of birth etc.);
 - c. Professional Information (Qualifications, Specialty, Continuing Professional Development, etc.);
 - d. Activities (Participation in eviDent, other dental and community activities and events); and
 - e. Your preferences, interests and behaviour relating to the eviDent Foundation
- 6. The types of sensitive information we collect include records of communication between us, which may include from time to time, information you provide to us or we collect from others. This includes, but is not limited to, the following types of information:
 - a. eviDent membership status and practice information;
 - b. Personal financial information;
 - c. Personal credit card data; and
 - d. Any idiosyncratic or personal information we obtain from you or others about you.



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Why we collect information about you

- 7. We collect information about members and others which enables us to communicate with them, introduce them to our organisation and inform them of the work we do.
- 8. We do not use the information in any way other than in the furtherance of our objects and purposes.
- 9. We might also use your information for the following purposes:
 - a. For the immediate reason for which you have provided it to us (for example, to enable eviDent to process your request, payment, registration, subscription, access to or delivery of service, etc.);
 - b. To maintain contact with you about eviDent's work, to report to you about eviDent's work, or to encourage you to learn about what eviDent does;
 - c. Any other purpose directly related to our work and for which you have provided consent (where it is reasonably required by law);
 - d. To disclose your contact details to the types of organisations to whom we normally do business including:
 - i. Mailing houses for delivery of eviDent or other related publications to you;
 - ii. Entities engaged by eviDent to undertake surveys or to collect practice or other data from you on our behalf; and
 - iii. Approved organisations such as affiliated societies, sponsors or partners for the purpose of promoting products for which the eviDent Foundation is directly affiliated.
- 10. We don't rent, sell or exchange your information.
- 11. We take all reasonable steps to ensure that these organisations are in turn bound by confidentiality and privacy obligations when handling your personal information.
- 12. If you don't want your personal information disclosed to another organisation, please inform eviDent at either the time we collect your information or any later time.
- 13. Sometimes we may be legally required to disclose your information, for example, to government departments. Such information would only be disclosed if legally obligated to do so.
- 14. We may also sometimes share non-personal, non-sensitive and de-identified information with other research organisations, and/or stakeholders.

How we collect your information

- 15. eviDent may collect information from you either directly or from third parties. Information we collect from third parties may be by formal or informal means.
- 16. Where we collect information from third parties, and it is not personal information that is contained in a Commonwealth record, we will take reasonable steps to destroy or de-identify the information as required by law.



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- 17. We collect personal information about supporters, donors, volunteers, employees, contractors and visitors to our events. We collect your information in the following ways:
 - a. Face to face contact;
 - b. Electronically including through our website and online surveys;
 - c. Via social media messages or conversation;
 - d. During phone calls;
 - e. Voice or image recordings;
 - f. Whilst delivering and administering services at our facilities; and
 - g. From forms, coupons and other correspondence (both in writing and electronically).

How we use your information

- 18. We only use your personal and sensitive information for the reason we collect it as set out above and for the purpose(s) for which it was collected, or as otherwise permitted by law.
- 19. We will not disclose the above information that we collect to affiliates without your consent.

Securing your information

20. We take reasonable steps to ensure the security of personal and sensitive information we hold and to protect it against loss, misuse or unauthorised access, destruction, use, modification or disclosure. Our IT systems are password protected and comply with applicable security standards.

Only authorised personnel are permitted to access these details. It is our policy to:

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

Anonymity

- 21. It is your right to be dealt with anonymously, provided that is it lawful and practicable.
- 22. We will try to accommodate a request for anonymity wherever possible; however we note that in some circumstances, this may prevent us from practically and effectively communicating with you. If this is the case we will notify you.

Web privacy

- 23. Please refer to Appendix I, eviDent Web Privacy Statement.
- 24. Links to other websites
 - a. Our website may contain links to third party websites, and third party websites may also have links to our website.
 - b. The eviDent Privacy Policy does not apply to external links or other websites. The operators of other websites may collect your personal information.



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c. We encourage you to read the privacy policies of any website you link to from our website.

Accessing and correcting your personal information

- 25. eviDent members can access their information by asking us or accessing their details through the eviDent member site using their confidential log in and password. Occasionally, we may need to refuse your request to access information, for example, where granting you access would infringe someone else's privacy.
- 26. When you request access, we will ask you to provide some form of identification so that we can ensure that you are the person to whom the information relates.
- 27. In some cases, we may also ask you to pay a reasonable fee to cover the cost of access.
- 28. If you have a question about this privacy policy, or want to access your personal information you can contact the eviDent Privacy Officer on 03 8825 4600 or alternatively send an email (to <u>ask@evident.net.au</u>). We will aim to respond to you within 28 days of receiving your request. If we're not able to help with your request, you will receive a written explanation as to why.

Complaints about a breach of your privacy

- 29. If you are concerned about how we have collected or managed your personal information we request you follow the procedure set out below;
 - a. Contact the eviDent Privacy Officer, who will be the Chief Executive Officer, contactable on 03 8825 4600 or <u>ask@evident.net.au</u>;
 - b. Complete and submit the Privacy Enquiry Form found in Appendix II to this policy.
- 30. In order to effectively address your complaint, we may request further information from you about your complaint and the reasons behind the submission;
- 31. After we receive all the information we need from you, allow us approximately 28 days to address your complaint.
- 32. If you're not satisfied with how we have handled your complaint you can also contact the Office of the Australian Information Commissioner (OAIC) (on www.oaic.gov.au/).
- 33. The OAIC is a government body independent of us. It has the power to investigate complaints about possible interference with your privacy.

Review

34. This policy will be reviewed and updated within three (3) years of the issue date, or earlier if required.



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Appendix I - eviDent web privacy statement

eviDent is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience. This Statement of Privacy applies to the eviDent web site and governs data collection and usage. By using the eviDent website, you consent to the data practices described in this statement.

Collection of your Personal Information

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

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

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through eviDent public message boards, this information may be collected and used by others. Note: eviDent does not read any of your private online communications.

eviDent encourages you to review the privacy statements of Web sites you choose to link to from eviDent so that you can understand how those Web sites collect, use and share your information. EviDent is not responsible for the privacy statements or other content on web sites outside of the eviDent web site.

Use of your Personal Information

eviDent collects and uses your personal information to operate the eviDent Web site and deliver the services you have requested. eviDent also uses your personally identifiable information to inform you of other products or services available from eviDent and its affiliates. eviDent may also contact you via surveys to conduct research.

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

eviDent does not use or disclose sensitive personal information, such as race or religion, without your explicit consent.



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eviDent keeps track of the pages our visitors view within our website, in order to determine which pages are the most popular. This data is used to deliver customized content and advertising within eviDent to members whose behaviour indicates that they are interested in a particular subject area.

eviDent will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on eviDent or its web site; (b) protect and defend the rights or property of eviDent; and, (c) act under exigent circumstances to protect the personal safety of users of eviDent, or the public.

Use of Cookies

The eviDent Web site use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize eviDent pages, or register with the eviDent site or services, a cookie helps eviDent to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same eviDent web site, the information you previously provided can be retrieved, so you can easily use the eviDent features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the eviDent services or web sites you visit.

Security of your Personal Information

eviDent secures your personal information from unauthorized access, use or disclosure. eviDent secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized 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

eviDent will occasionally update this Statement of Privacy to reflect company and customer feedback. eviDent encourages you to periodically review this Statement to be informed of how eviDent is protecting your information.



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Contact Information

eviDent welcomes your comments regarding this Statement of Privacy. If you believe that eviDent has not adhered to this Statement, please contact eviDent at <u>ask@evident.net.au</u>. We will use all reasonable efforts to promptly determine and remedy the problem.



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Appendix II – Privacy enquiry Form

Your name:
Your contact details:
Your contact details:
Your preferred contact phone number:
Your email address:
Vour mailing address:
Your mailing address:
Please enter the details of your enquiry here:

Please return this form to: eviDent Foundation Chief Executive Officer (the eviDent Privacy Officer)

Email: <u>ask@evident.net.au</u>

Mailing address: eviDent Foundation Chief Executive Officer C/o ADAVB PO Box 9015 South Yarra Vic 3141