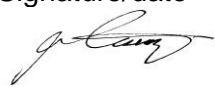


Review Date: New policy
Date Developed: July 2014
Principal Responsibility: AOA Board
Endorsed: 05/07/2014 Board Meeting

Approved by:	Title: CEO	Name: Adrian Cosenza	Signature/date  16/07/2014
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OUTCOME:

The purpose of this Privacy Policy is to describe how AOA collects, uses and discloses information and how you may access and correct this information.

DEFINITIONS:

- **Privacy** – the handling of personal information about an individual or organisation. This includes the collection, use, storage and disclosure of personal information, and access to and correction of that information.
- **Personal Information** – recorded information and/or opinion about an individual whose identity is apparent or could be easily ascertained from the information and/or opinion.
- **Cross border** – outside of Australia.

POLICY

- The Australian Orthopaedic Association (AOA) is committed to maintaining the privacy of its Fellows, Members, trainees, applicants for training, suppliers, conference delegates and other individuals who interact with AOA and has developed this Privacy Policy in line with the Australian Privacy Principles as established under the Privacy Act 1988 (Cth) (Privacy Act).
- AOA is bound by the Australian Privacy Principles that establish the benchmark for how personal information should be handled. AOA has adopted those principles as part of its standard business procedures. All personal information obtained and held by AOA is dealt with in a uniform manner and every effort is made to maintain its security.

STRATEGIES:

1. Personal Information
2. Collection of Personal Information
3. Use & Disclosure of Personal information
4. Cross Border Disclosure
5. Storage and security of personal information
6. Access to personal information
7. Currency of Personal Information
8. Correction of Personal Information
9. Direct Marketing
10. Cookies
11. How to make a complaint
12. Consent

1. Personal Information

- AOA holds personal information about its Fellows, Members, trainees, applicants for training, suppliers, conference delegates and other individuals who interact with AOA (referred to in this Privacy Policy as “you”). This information includes, but is not limited to, name, address, phone number, fax number and email address. It may also include other personal information and financial information.
- AOA does not wish to collect any Sensitive Information (as that term is defined in the Privacy Act) about you, including information or opinions about your political affiliations, sexual preferences, religious beliefs and racial or ethnic origin.

2. Collection of personal information

- 2.1. AOA collects and holds personal information about you for the purposes of:
- a) facilitating the provision of services by AOA and its state branches (including but not limited to AOA’s Fellowship administration service, the selection to and delivery of AOA’s surgical education and training program and continuing professional development program and the organisation of educational conferences and meetings);
 - b) conducting anonymous voluntary member surveys in order to gain member feedback on AOA related matters and improve the services provided by AOA to its members;
 - c) facilitating the provision of services by AOA affiliate bodies (including the AOA Research Foundation, AOA National Joint Replacement Registry, Orthopaedic Women’s Link, AOA Fellowships Program and the Australian Orthopaedic Registrars’ Association);
 - d) providing member-related information to you;
 - e) organising continuing education and training programs;
 - f) AOA’s administrative functions;
 - g) supporting and managing password protected, member-only access to the AOA website and other AOA online platforms;
 - h) supporting and managing an online member and public directory on the AOA website; and
 - i) administering the activities of an AOA member in fulfilling their representative duties (such as a position on the AOA Board, an AOA Committee, as a training supervisor, hospital inspector, director of training or examiner).
- 2.2 AOA collects personal information in a number of ways, including:
- a) directly from the contact person and/or a designated nominee through various online and hard copy registration and application forms issued to facilitate the provision of services by AOA;
 - b) via the AOA website;
 - c) via AOA’s online eLearning Centre;
 - d) via fax and other electronic means, including credit card payment remittance slips;
 - e) through online surveys where the member has not chosen to remain anonymous.

3. Use & Disclosure of Personal Information

- 3.1 AOA has a policy of not disclosing personal information contained on its database to any outside body, other than its affiliate bodies named in clause 3.1(c). This means

that use of the database containing personal information is restricted solely to AOA. However, where required to do so by law, AOA will disclose personal information about you.

- 3.2 A directory of surgeons is maintained by AOA for the purpose of providing a service to the public and this information is available on the AOA website. The information disclosed on the directory consists of the member's name, suburb in which the member's practice is located, and the member's nominated preferred contact details (this may include their email address, postal address, and practice/home/mobile telephone numbers). All members have the right to have their name removed from the directory upon request. To make this request please contact our Privacy Officer on 02 8071 8000 or at admin@aoa.org.au.

4. Cross Border Disclosure

- 4.1. AOA may provide your information to overseas recipients in the following circumstances:
- (a) through the 'Find a Surgeon' directory tool on the AOA website. You have the option to opt in to this service on the AOA website;
 - (b) via the AOA eProceedings, which is an online directory that publishes the audio- recorded presentations featured at AOA meetings to AOA members and meeting delegates. You are given the option to opt in to be included in the AOA eProceedings and if you do not opt in then you will be excluded from the eProceedings; and
 - (c) through the listing of Fellowship supervisor contact details on the AOA Accredited Fellowships page of the AOA website for international candidates to make contact with the relevant Fellowship supervisor. The listing of such contact details will be approved via email if you are a Fellowship supervisor.
- 4.2. By opting in to these services you consent to the disclosure of your personal information to such overseas recipients.

5. Storage and Security of Personal Information

- 5.1 AOA stores personal information in a combination of secure computer based storage facilities and paper based files and records.
- 5.2 AOA generally uses accepted technology and security so that it is satisfied that personal information is transmitted safely to it through the internet or other electronic means.
- 5.3 AOA will use its reasonable endeavours to protect your personal information from misuse, unauthorised access, disclosure, modification or loss. AOA's officers, employees, agents and third party contractors are expected to observe the confidentiality of your personal information.
- 5.4 Despite its reasonable endeavours, AOA is unable to ensure or warrant the security of any personal information transmitted to AOA and all personal information disclosed by you to AOA is at your own risk.

- 5.5 Where AOA no longer requires personal information it has collected and stored and is not required by or under an Australian law, or an order of a court or tribunal, to retain the information, AOA will take such steps as are reasonable in the circumstances to destroy the information or to ensure that the information is no longer personal information.

6. Access to Personal Information

- 6.1 Upon request, AOA will inform you of the type of personal information held about you. You have the right to access your personal information stored on computer, on a database, in personnel files or in any other form at AOA to ensure that it is accurate, unless AOA has a legal duty of confidentiality or non-disclosure.
- 6.2. If you would like to exercise your right to access your personal information please contact our Privacy Officer. It is our policy that all requests for access be made in writing. Our Privacy Officer will arrange for an access form to be sent to you and can assist with any enquiries you may have about the process. AOA must respond to a request by you to access your personal information within a reasonable period after the request is made.
- 6.3. AOA, in its discretion, may refuse to grant you access to your personal information to the extent that such denial is permitted by the Australian Privacy Principles. If AOA refuses your request to access your personal information under the Australian Privacy Principles, AOA must, in writing:
- (a) where reasonable, give reasons for the refusal; and
 - (b) notify you of the mechanisms to complain about the refusal; and
 - (c) inform you of any other matter prescribed by the regulations.

7. Currency of Personal Information

- 7.1 AOA will take all reasonable precautions to ensure that the personal information it collects, uses and discloses is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information provided by you. In order to prevent inaccuracies in your personal information you should:
- (a) let AOA know if there are any errors in your personal information; and
 - (b) keep AOA up to date with any changes to your personal information such as name, address and telephone number.

8. Correction of Personal Information

- 8.1. You may contact the Privacy Officer appointed by AOA to correct any of your personal information that is inaccurate, out-of-date, incomplete or to request that your personal information be deleted. You can contact the Privacy Officer on 02 8071 8000 or at admin@aoa.org.au. If AOA is satisfied that your personal information is inaccurate, out-of-date, incomplete or irrelevant, or if you request AOA to correct your personal information then AOA must take reasonable steps to correct your personal information to ensure that, having regard to the purpose for which it is held, it is accurate, up-to-date, complete and relevant.

- 8.2. AOA must respond to a request by you to correct your personal information within a reasonable period after the request is made.
- 8.3. AOA will not charge you a fee for the making of the request or for correcting your personal information.
- 8.4. If AOA has previously disclosed your personal information to another entity, AOA will take reasonable steps to notify the other entity of the correction (unless it is impracticable or unlawful to do so) if you make such a request.
- 8.5. If AOA refuses your request to correct information, AOA must, in writing:
 - (a) give reasons for the refusal except to the extent it would be unreasonable to do so; and
 - (b) notify you of the mechanisms available to complain about the refusal; and
 - (c) inform you of any other matters prescribed by the privacy regulations.

9. Direct Marketing

- 9.1. AOA may use your personal information for direct marketing purposes, including for the purposes set out in clause 3.1(a), to communicate opportunities related to your AOA membership, such as conferences and events being organised by AOA, via email, text message and postal mail.
- 9.2. If you do not wish to receive any marketing material from us you can opt out by contacting us on (02) 8071 8000 or by email at admin@aoa.org.au.
- 9.3. AOA does not pass on any personal information to third parties for direct marketing purposes, other than to its affiliates named in clause 3.1(c).

10. Cookies

A Cookie is a feature stored on your computer's hard drive by your web browser. On each visit to the Website, the AOA web browser will recognise the Cookie and give AOA information about your visit. AOA uses Cookies for the purpose of allowing you to have your password saved for easy repeated access to the website. AOA may also use Cookies to learn about your preferences and the way that you use the Website, so that it can improve the Website. Most browsers accept Cookies automatically, but you should also be able to alter the settings of the browser to refuse Cookies. You should note that de-activating Cookies may mean that you will no longer be able to enjoy the full operational capabilities of the Website.

11. How to Make a Complaint

- 11.1. If you are concerned that AOA may have handled your personal information inappropriately or you have a complaint regarding an interference with your privacy, please contact our Privacy Officer by telephone on (02) 8071 8000 or by email at admin@aoa.org.au
- 11.2. Upon receipt of your complaint, AOA will handle the complaint in accordance with its Complaints Handling Process and Policy. This requires AOA to:

- (a) confirm receipt of your complaint;
- (b) advise you what steps will be taken to investigate your complaint;
- (c) provide an approximate timeframe within which your complaint will be resolved;
- (d) make a decision in relation to your complaint; and
- (e) inform you of the outcome of your complaint and the reasons for the decision.

11.3. In response to any complaint, AOA will:

- a) treat all complaints sensitively, seriously and sympathetically;
- b) attempt to resolve the matter promptly;
- c) keep accurate records of your complaint, AOA's investigation of your complaint and the outcome reached.

12. Consent

You acknowledge and agree that by providing your personal information to AOA that AOA, its related bodies corporate and partners and each of their officers, employees, agents and contractors are permitted to collect, store, use and disclose your personal information in the manner set out in this Privacy Policy and in accordance with the Australian Privacy Principles

OTHER INFORMATION

If you have any queries about this Privacy Policy, wish to gain access to or correct personal information AOA may hold about you or have any complaints regarding an interference with your privacy or the way we manage your personal information you may contact the Privacy Officer appointed by AOA by telephone on (02) 8071 8000 or by email at:

admin@aoa.org.au

PERFORMANCE INDICATOR/S

Accuracy of stored information on audit

Number of complaints

Privacy Collection Notice

1. Contact Details

Australian Orthopaedic Association
Level 12, 45 Clarence Street
SYDNEY NSW 2000
Phone: 02 8071 8000
Fax: 02 8071 8002
Email: admin@aoa.org.au
Website: <http://www.aoa.org.au/>

2. Collection of Personal Information

- 2.1. The Australian Orthopaedic Association (AOA) collects and holds personal information about you for the purposes of providing services and information to you, organising continuing education and training programs and maintaining an online member directory.
- 2.2. AOA collects personal information from you and/or your designated nominee in a number of ways including when you directly correspond with us, complete registration and application forms for us and when you make use of the AOA website.
- 2.3. If you choose not to provide your personal information to AOA then it may not be possible for AOA to provide you with services.

3. Disclosure of Personal Information

- 3.1. AOA has a policy of not disclosing personal information contained on its database to any outside body, other than its affiliate bodies which include the AOA Research Foundation, AOA National Joint Replacement Registry, Orthopaedic Women's Link, AOA Fellowships Program and the Australian Orthopaedic Registrars' Association. However, where required to do so by law, AOA will disclose personal information about you.
- 3.2. AOA may disclose your name, the suburb in which your practice is located, and your nominated preferred contact details (this may include your email address, postal address, and practice/home/mobile telephone numbers) through our directory of surgeons available on the AOA website. AOA may provide your information to overseas recipients through this directory and other AOA services including AOA eProceedings and the AOA Accredited Fellowships page.

4. Access to Personal Information and Complaints Procedure

- 4.1. AOA's Privacy Policy available at *(insert link to Privacy Policy)* contains information about how you may access and seek correction of your personal information, complain

about a breach of the Australian Privacy Principles by AOA and how AOA will deal with such a complaint.