

ACAM Privacy Policy

**POLICY NUMBER/
REFERENCE:** 18-250723

POLICY TITLE: ACAM Privacy Policy.

POLICY STATEMENT:

ACAM CPD Home is committed to ensuring the privacy and confidentiality of the information we collect from its subscribers, members and fellows, visitors to our website and people who communicate with us. We are required to abide by the Commonwealth, State and Territory privacy laws and principles from these laws. The purpose of this policy is to share with subscribers how we handle their personal information and protect their privacy in accordance with relevant legislation.

We are subject to and comply with the [*Privacy Act 1988 No. 119, 1988 as amended*](#) and other applicable State and Territory privacy laws. There is more information about these laws on the Australian Information Commissioner's website. This policy outlines the way ACAM CPD Home collects, holds, uses, and discloses personal information, and the procedures that allow access to this information. The policy also outlines how ACAM CPD Home will respond to suspected or known data breaches of personal information.

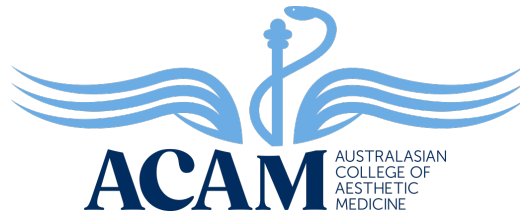
DEFINITIONS:

ACAM CPD Home membership is available to non-exempt medical practitioners in Australia at www.acam.org.au so they may compile their CPD hours for their triennium. It is not limited to members and fellows of ACAM but is open to those whose academic and clinical practice are aligned with the Australasian College of Aesthetic Medicine.

ACAM collects personal information from members, fellows, CPD Home users, persons enquiring or apply for ACAM courses and fellowship pathways, website enquiries and visitors, and government agencies and businesses.

Collection: This information is collected directly from the person, via email, telephone calls, or our website. Our website includes a [privacy statement](#) which deals with specific matters of collecting the information through the website. In relation to members, fellows and CPD Home subscribers, information collected will include (where applicable) information about other medical associations, institutions, and professional groups. As a member, fellow and user ACAM will need your name and contact details to keep you informed of all activities, up to date news and benefits managed by the college.

Retention and Storage: ACAM will retain member and users' personal information for five years upon membership becoming inactive. All data will be kept securely stored in Sydney, on the cloud at



Amazon Web servers' level S3 simple service where all membership records and other personal information will be kept.

Disposal: All data deemed for disposal; which includes paper records and electronic media; will be destroyed so that it is completely unreadable and cannot be accessed or used for unauthorised purposes.

Access: Access to all personal information is limited to two administrators who will identify and monitor access levels of other editors from time to time who serve on the Board and for the purposes of upgrading software.

Cyber Security: There is a deliberate combination of technologies, processes and practices to protect information and the networks, computer systems and appliances, and programmes used to collect process store and transport the information from attack damage and unauthorised access.

PROCEDURES:

What personal information do we collect and how do we collect this?

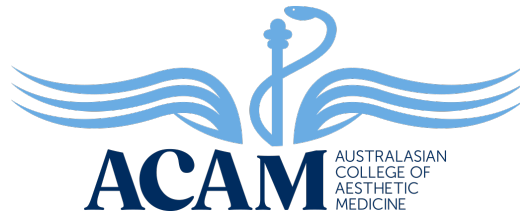
ACAM CPD Home collects personal information from persons enquiring about or applying for the ACAM CPD Home service. This may include subscribers, members, fellows, members of the public, journalists, government agencies and other organisations seeking information or comment about our services, visitors to our website, and individuals purchasing services from us and from our suppliers. ACAM CPD Home will do its utmost to protect any sensitive information collected in these processes.

Individual/personal information is collected directly and indirectly where required from individuals when they subscribe or make contact with ACAM CPD Home:

- Personal information may include full name, contact details, payment details and may include other personal information (e.g. professional details);
- Personal information collected may be provided directly by you, such as when completing a form, corresponding, or communicating with us (including in person, digitally, telephonically, or electronically).

ACAM CPD Home may also collect personal information indirectly via publicly available sources (not limited to) such as websites, social media, directories and databases.

- Personal information may also be collected indirectly while providing a service or via the complaint management process and this may include:
 - via authorised representatives of an individual;
 - CPD activity supporting documents;
 - CPD Home representative, consultants, or service providers; regulatory bodies, authorities and bodies, professional or specialist societies or associations.
- ACAM also collects information about subscribers', members and fellows use of the service, such as module completions or module views.



How do we use and store your personal information?

ACAM CPD Home uses this information to:

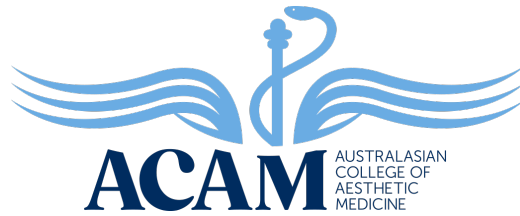
- verify an individual's eligibility to access the services of the ACAM CPD Home and any applicable discounts (member's benefits);
- inform individuals about the services, education and learning, member's benefits events and publications ACAM provide;
- provide you with ACAM CPD Home services;
- enable the ACAM CPD Dashboard software to assist individuals to manage their CPD activities and reporting;
- improve ACAM's services, for example, to understand which learning and educational topics are relevant, or to support ACAM website improvements for subscribers, members and fellows;
- communicate with individuals about their CPD compliance; and
- report an individual's compliance status to the Medical Board of Australia to meet the CPD standards framework and registration standards.

ACAM stores individual's information in electronic systems which are housed in the Cloud under ACAM's control. ACAM takes appropriate steps to protect the security of the information it holds about individuals, including protections against unauthorised access, virus or other electronic intrusions, as well as fire, theft or loss. ACAM requires any contracted providers of IT services to provide the same provisions.

ACAM's representatives are bound by strict requirements regarding the protection of the privacy of the information ACAM collects and holds about individuals. ACAM or any contracted providers of IT services may use servers, systems and Cloud computing providers outside of Australia. ACAM's contracts with contracted providers of IT services require them to protect the privacy of individual information when held on stored servers in Sydney, on the cloud at Amazon Web servers' level S3 simple service where all membership records and other personal information will be kept. Our contractors are also required to comply with the *Privacy Act 1988* [C2014C00076](#) No. 119, 1988 as amended.

Use of personal information for direct marketing?

- Australian privacy law limits the use of personal information for direct marketing of goods and services. ACAM uses your personal information to keep you informed about ACAM CPD Home services, products, events and publications.
- When ACAM sends individual direct marketing material about ACAM's services, we provide the individual with a means to advise ACAM that they no longer wish to receive some or all of this material.
- If at any time an individual has a concern about direct marketing material they have received from ACAM, or wishes to change their preferences in relation to receipt of future material, they may provide feedback on the eDM, change their profile preferences or contact info@acam.org.au update their preferences.



How can ACAM CPD Home subscribers, member's and fellows update or amend their information?

ACAM CPD Home subscribers, members and fellows can easily update their information by visiting www.acam.org.au or by contacting the ACAM CPD Home team by email: helpdesk@acam.org.au.

Do you have a right to see what information we hold about you?

Under the *Privacy Act 1988* (Cth), every individual has the right of access to personal information ACAM holds about them. These rights also include correction of any errors in this information. Should an individual wish to access this information, please contact ACAM at info@acam.org.au. In most cases, unless the access you request will require special steps or significant resources, there will be no charge for providing you with this access.

Do you send my information overseas?

In addition to the use from time to time of data storage and cloud providers, ACAM may provide de-identified data to overseas bodies. For example, ACAM may provide de-identified data in reports concerning uptake of specific education and learning activities to a certified course merchant provider who could be based overseas.

How long do you keep my personal information?

ACAM will generally keep an individual's personal information active for as long as is reasonably required to enable ACAM to meet individual needs in the ACAM CPD program. ACAM keeps subscriber, members and fellow records and other personal information on file to enable ACAM to undertake statistical and historical analysis and reporting. As part of ACAM's data security ACAM regularly backups and archives ACAM's electronic databases. Non-subscriber information will be retained for up to 7 years.

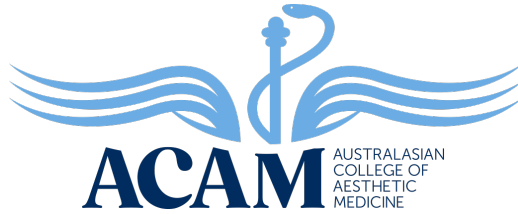
What happens should you suspect or reasonably suspect there is a data breach?

If ACAM suspect's or know there has been a data breach, in line with the Australian Information Commissioner's guide for managing and responding to data breaches, we will act to:

- **Contain** - the breach to prevent any further compromise of personal information;
- **Assess** - the situation to determine how the breach occurred and evaluate the risks, including any potential harm to affected individuals, and where possible take remedial action to reduce any risk of harm;
- **Notify** – individuals and the Commissioner, as may be required, and in a manner deemed appropriate; and
- **Review** - the incident and take action to prevent further breaches.

Where can I find out more?

If an individual would like further information regarding how ACAM collects, stores, uses or discloses personal information, or if any individuals have any issues or concerns, please contact ACAM CPD Home by emailing notifications@acam.org.au.



AMENDMENTS/REVIEW:

‘Review or Amended by the Management Committee (23 July 2023)’
‘Endorsed by Management Committee (31 July 2023)’

RELATED DOCUMENTS:

1. Office of the Australian Information Commissioner-Data breach preparation and response
A guide to managing data breaches in accordance with the Privacy Act 1988 (Cth)
2. Glossary of Terminology

REFERENCES:

Australian Government Office of the Australian Information Commissioner <https://www.oaic.gov.au/privacy>

The Australian Privacy Act 1988, <https://www.oaic.gov.au/privacy/privacy-legislation/the-privacy-act>

File: ACAM Policy and Procedural Manual/Policy Manual Complete/Updated Policies/ACAM Privacy Policy
18-250723

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