



PRIVACY POLICY

INTRODUCTION

The South Australian Salaried Medical Officers Association (SASMOA) is the State-based Union for appropriately qualified doctors who work in salaried positions in hospitals and community health services in South Australia.

Salaried doctors include:

- Interns;
- Resident Medical Officers;
- Registrars and Senior Registrars;
- Consultants and Senior Consultants;
- Visiting Medical Specialists;
- Clinical Academics; and
- Other salaried doctors employed in various community health services.

SASMOA is a registered industrial association under the *Fair Work Act 1994 (SA)* and the employee party to all major State registered Awards and Agreements covering salaried doctors in SA.

SASMOA members also become members of the ASMOF (SA) branch, via a conjoint agreement.

ASMOF is the Australian Salaried Medical Officers Federation, which is the Australian trade union registered with the Fair Work Commission to represent the interests of salaried doctors in the private sector, such as GP Registrars, and under the federal jurisdiction.

SASMOA and ASMOF (SA) (referred to hereafter in this Policy as “the Union/s”) collect personal information in order to conduct the business of providing industrial advice, support and representation to members (either individually or collectively), and undertaking negotiations and providing services in members’ individual or collective interests.

The Union/s are committed to protecting your privacy and to providing you with information and services relevant to you.

The Union/s comply with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs). This Privacy Policy (Policy) should be read in conjunction with the Privacy Act and the APPs.

HOW THIS POLICY APPLIES

This Policy applies to personal information the Union/s collect from you:

- via one of our websites;
- via social media;
- via telephone;
- via email;
- in person; and/or
- in writing.

This Policy also applies to personal information the Union/s collect from the Australian Council of Trade Unions (ACTU) or any other third party, about you.

PERSONAL INFORMATION THE UNION/S COLLECT, HOLD, USE AND DISCLOSE

Personal information is collected from individuals by the Union/s and used, held and disclosed for the following purposes:

- membership management and services;
- workplace campaigning, representation and recruitment;
- industrial, political, legal and social campaigns consistent with the objects of the union; and
- the provision of other services, including industrial representation, education, insurance, financial, news, and similar services.

The kind of personal information collected by the Union/s varies. On joining the Union/s, a membership form is completed, containing basic personal information, such as name, address, contact details, qualifications, method of payment and other details relevant to the maintenance of membership records and collection of union dues.

During their membership, a member may need the assistance of the Union/s to deal with individual workplace and membership matters. In those circumstances, further personal information about that matter may be collected for industrial representation or the provision of other services.

The Union/s may also collect additional personal information related to an individual's participation in union issues, activities, campaigns or representational and elected roles. In the course of its recruitment, campaigning, and other activities, the Union/s may also collect personal information about a non-member.

In providing personal information to the Union/s, persons are taken to have given consent to the treatment of their personal information by the Union/s in accordance with this Policy.

The Union/s collect sensitive information where that information relates to the functions or activities of the Union/s and with the person's consent. Sensitive information can include membership of a trade union, race or ethnic origin, gender identification, political opinions or political membership, and health information.

Personal information can be collected through information provided to the Union/s, including through emails, petitions, surveys, meeting attendance sheets, website or social media, and from publicly available information. Where reasonable and practicable, this will usually be done by the individual providing the Union/s with the relevant personal information. Such information will be used in a manner consistent with this Policy or with the person's consent.

The Union/s receive personal information from candidates for potential employment at the Union/s, and that information is only used, held and disclosed to consider that person for

prospective employment. This information is used for the management of the employment relationship and comes within the relevant exemption in the Privacy Act. The Union/s also collect information about its employees and officials to manage its human resources.

DISCLOSURE

In some circumstances, the Union/s may provide an individual's personal information to other organisations, including trade union-related organisations or peak bodies. These circumstances could include:

- where it is required or authorised by law;
- organisations contracted to undertake work on the Unions' behalf (including information technology providers, print service providers, mail houses);
- organisations that provide news services that may be of interest to our members; and
- as part of a broader trade union movement campaign relevant to our members' employment and in which the Union/s are participating.

WEBSITE

The Union/s website has a public space, accessible by any user, and a secure member-only space accessible only by Union members and which requires a password.

The Union/s website collect two types of information.

Anonymous information

The first type is anonymous information. The web server makes a record of each visit and logs the following information for statistical purposes:

- the user's server address;
- the user's top-level domain name (e.g. com, .gov, .net, .au, etc.);
- the date and time of the visit to the site;
- the pages accessed and documents downloaded;
- the previous site visited; and
- the type of browser used.

No attempt will be made to identify users of the Union/s public website or their browsing activities except where a law enforcement agency may exercise a warrant to inspect the internet service provider's logs.

To assist members in accessing the secure website, the Union/s can identify an individual member's most recent access to the Union/s member-only space. No attempt will be made to track a member's browsing activities except where a law enforcement agency may exercise a warrant to inspect the internet service provider's logs.

Cookies and Automated Information Collection

Another way information may be collected is through "cookies". A cookie is a small text file from the website that may be placed on the user's computer. Cookies are used to track logins, sessions, and collect anonymous traffic data on the Union/s website. The website also uses tracking pixels that allow third parties, including Facebook, to use cookies and other automated technologies to collect or receive specific types of information and use that information to provide targeted Union ads. No personal information is collected or shared as a result of using these pixels.

Users can adjust their Internet browser to disable cookies or warn them when cookies are being used. However, if they disable cookies, they may not be able to access certain areas of the Union website or take advantage of the improved website experience that cookies offer.

Users can opt-out of receiving targeted Facebook ads at https://www.facebook.com/ads/website_custom_audiences

Our websites may contain links to other websites and social media pages, including Facebook, Twitter and other sites. We are not responsible for the privacy policies of the entities responsible for those websites, and we recommend that users review the privacy policies applicable to any other websites they visit.

QUALITY

The Union/s take all reasonable steps to ensure the information collected is accurate, up-to-date, and complete. When this information is used or disclosed, it is accurate up to date, complete, and relevant.

SECURITY

The Union/s collect and hold personal information in two forms:

1. Paper-based files; and
2. Electronically

Current paper files containing personal information are securely stored. Locked bins are used in the Union office for security disposal.

Increasingly personal information is only held in electronic files. Electronically-stored information is securely stored and password protected.

All staff are made aware of the requirement to store personal information securely.

OPENNESS

The Privacy Policy is available and accessible on the Union/s website. If requested by a person, the Union will provide them with a copy of its Privacy Policy.

ACCESS

If an individual so requests, they may access the information held about them by the Union/s. This access would only be limited if:

- the Union/s reasonably believe it would pose a serious threat to the life, health or safety of any individual or public health or safety;
- giving access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between the individual and the organisation and would not be accessible through the process of discovery;
- giving access would reveal the intentions of the Union/s in relation to negotiations with the individual and would prejudice those negotiations;
- giving access would be unlawful;
- denying access is required or authorised by or under an Australian law or a court/tribunal order;
- the Union/s suspect an unlawful activity, or misconduct of a serious nature, that relates to the Unions' functions or activities has been or may be engaged in and

giving access would likely prejudice the taking of appropriate action in relation to the matter;

- access would likely prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- giving access would reveal evaluative information generated within the Union/s in connection with a commercially-sensitive decision-making process.

If an access request is made, the Union/s will respond within a reasonable period.

If access is denied, the Union/s will give the requestor reasons for the refusal and the mechanisms available to seek redress.

To gain access to personal information about you held by the Union/s, contact the Union/s' Chief Industrial Officer.

CORRECTION

If the Union/s are satisfied that personal information it holds is inaccurate, out of date, incomplete, irrelevant or misleading, or if a person requests the Union/s correct their personal information, the Union/s will take reasonable steps to correct that information.

If a person requests the Union/s to correct their personal information, the Union/s will respond to that request by making the correction or by notifying that person of the Unions' refusal to make the correction within a reasonable timeframe. If the request is denied, the Union/s will give the requestor reasons for the refusal and the mechanisms available to complain.

To gain access to personal information about you held by the Union/s, contact the Unions' Chief Industrial Officer.

IDENTIFIERS

The Union/s record some members' employee numbers on its membership system. This information is required by individual Commonwealth agencies for the purposes of organising payroll deductions.

The Union/s do not adopt or use the employee number as its own identifier.

ANONYMITY AND PSEUDONYMITY

Where individuals contact the Union/s with information relevant to the individual and the Union, and they do not wish to be identified, the Union/s undertake to ensure they remain anonymous or pseudonymous, unless it is impractical for the Union/s to deal with the person in this way.

HOW THE UNION/S HOLD PERSONAL INFORMATION

Wherever reasonably practicable, the Union/s hold electronic personal information on data servers owned and controlled by the Union/s in Australia. The data servers are password protected and login secured. However, by providing personal information to the Union/s, you consent to your information being stored and processed on a data server or data servers (which may - or may not - in the future include cloud services) owned by a third party or third parties that may be located outside of Australia. If personal information is only routed through servers located outside of Australia this is not regarded as a disclosure. The Union/s will take reasonable steps to ensure that any third party providers comply with the APPs.

The Union/s hold physical personal information in access controlled premises wherever reasonably practicable.

When the Union/s no longer require your personal information for a specific purpose, and we are not required to keep it to comply with any laws, we will take such steps as are reasonable in the circumstances to destroy your personal information or ensure that the information is de-identified.

DIRECT MARKETING

By providing personal information, in accordance with this Policy, the Union/s may use and disclose individuals' personal information for direct marketing, which may include providing them with information about events, products, or services that may be of interest to them. If individuals do not want us to use their personal information for direct marketing purposes, they may elect not to receive communications.

COMPLAINTS HANDLING

The Union/s will deal with any privacy complaint seriously, promptly and confidentially. If a person thinks the Union/s have infringed with their privacy, they will be directed to the Unions' employee/official responsible.

If this does not resolve the issues, the matter will then be referred to the Chief Industrial Officer or their delegate, who will investigate the claim and provide a response and reasons to the person.

The person, if still unsatisfied, may then complain to the Information Commissioner. Alternatively, the person may complain at the first instance to the Information Commissioner.

The Information Commissioner has powers to conduct an investigation under the Privacy Act and associated regulations.

VARIATION

This Policy may be varied from time to time, and an updated version will be posted on the Union/s website. Please check our website regularly to access the most recent version of the Policy.

WHO TO CONTACT

Any privacy-related questions or complaints can be directed to the Chief Industrial Officer via:

- Phone on (08) 8267 5151
- Email at: sasmoa@sasmoa.com
- Mail to: SASMOA / ASMOF (SA), Suite 6, Level 1, 128 Fullarton Road, Norwood SA 5067