

CDSS PRIVACY STATEMENT

TERMS AND CONDITIONS

Purpose

Creative Data Systems & Solutions (CDSS) takes your privacy seriously. In dealing with personal information, we comply with the Australian Privacy Principles contained in the Privacy Act 1988 (Privacy Act) and any relevant state or territory privacy legislation. This privacy policy outlines the personal information handling practices by CDSS and will be reviewed by CDSS management on a regular basis to ensure adherence to Australian Privacy Principles.

Overview

CDSS consults with practices, health professionals, service providers, health organisations and governments regarding health and business management services. CDSS collects, holds, and uses personal information to carry out its activities.

Definitions

In this privacy policy, personal information also refers to organisational information. Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information is recorded in a material form or not. Personal information can include sensitive information about a person such as information or opinion about an individual's cultural origin, political opinion, religious beliefs, sexual orientation criminal record or health information.

Collection of personal information

We primarily collect information about you when you use or request a product or service, complete a survey or enrolment form, or when you communicate with us by email, social or networking platforms, telephone, in writing or in person. We also collect information about you if you are providing services to us or apply for employment with us. The types of personal information that we collect will vary depending on your relationship with us. Please note that we try and collect only the information that we need for a particular function, and only hold it for as long as it remains necessary for the purposes for which it was collected. We only use your personal information for the purposes for which you gave it to us or for directly related purposes you would expect or if you have provided consent, such as:

- Conduct evaluations of our programs and services
- Contact you for feedback on programs and services
- Assist us to perform our corporate and contractual obligations
- Participate in CDSS public consultations, surveys projects, register for programs, projects, or submissions
- Contact CDSS for information, advice or to engage in consultation services
- Access CDSS website or subscription services

The information in these records may include:

- title, name and date of birth
- address, email or telephone number
- other contact details
- program or project
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- business details including financial information such as ABN / ACN, solvency
- disclosures of interest
- insurances
- occupation and/or job title
- resume
- financial information such as TFN, bank account and superannuation

CDSS may obtain personal information from a third party, such as to contact stakeholders who may be interested in CDSS's work, or who may wish to participate in surveys, or construct databases of contact details for the purpose of informing relevant parties about relevant opportunities.

Dealing with CDSS anonymously

You can ask CDSS to deal with you anonymously or pseudonymously (using a fictitious name) unless CDSS expressly identifies that it is not practicable to deal with you on that basis. In most cases, CDSS will require your contact details.

Information collected by our website

When you visit the CDSS website, our web server may request your browser to create a cookie on your computer. A cookie is a small piece of information sent by our server to your browser by other sites.

Our cookies do not contain personal information about users. However, cookies can identify a user's browser. The cookies transferred by our website are used for such things as capturing information about a user's web browser, controlling a pop-up window or enabling login access to password protected areas of the website.

Our analytics systems use cookies to gather information regarding visitor activity to our websites. This is not used to identify you as an individual but is collated into aggregate results or classifications. Third parties may also use their own cookies to collect non-personal information about your activities on our website. The cookies placed by third parties are subject to the privacy policies of these third parties, and as such CDSS has no control over these cookies. If you do not wish to receive any cookies, you may adjust your browser settings to refuse them; go to the browser's help menu for instructions.

When you visit the CDSS website, the following information may be collected for statistical or systems administration purposes:

- your address
- your top-level domain name
- the date and time of access to the site and duration
- pages accessed and documents downloaded
- type of browser and operating system used.

Analytic and session tools

CDSS uses a range of tools provided by third parties, such as Google Analytics, to collect or view website traffic information. These sites have their own privacy policies.

The information collected by these tools may include the IP address of the device you are using and the pages accessed on our site. CDSS uses this information to maintain, secure and improve our website and to enhance your experience when using it. In relation to Google Analytics, you can opt out of the collection of this information using the Google Analytics Opt-out Browser Add-on.

No attempt will be made to identify anonymous users unless CDSS is legally compelled to do so, such as in the event of an investigation, or where a law enforcement agency may exercise a warrant to inspect the Internet Service Provider's log files.

Social networking services

CDSS may use social networking services such as Facebook and Twitter to communicate with the public about its work. When you communicate with CDSS using these services, CDSS may collect your personal information, but it is only used to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These sites have their own privacy policies.

CDSS may access a number of social media pages, including Facebook, Twitter and YouTube and comments posted on these are open to the public. If you upload content to these pages, you should be aware that your information is collected by the company operating the social media page (for example, Facebook, Twitter or YouTube). You should refer to the privacy policy of that social media company for information on how the organisation collects, uses and discloses personal information. CDSS may collect personal information from published social media posts that you have uploaded to those platforms.

Use or disclosure of your personal information

CDSS will not be taken to have breached its obligations under this policy or the Privacy Act where:

- a person has consented to the use or disclosure of their personal information
- a purpose for which the personal information is to be used is directly related to the purpose for which it was collected
- a person would reasonably expect, or has been told, that personal information may be published or passed to certain individuals (including the general public), bodies or agencies
- it uses the personal information to enable effective management or auditing of a funding agreement or CDSS' grants management system
- the disclosure of personal information:
 - is required or permitted by law
 - will prevent or lessen a serious and imminent threat to somebody's life or health
 - the personal information is in the public domain

- Access to CDSS records and your personal information is limited to those who have an operational need or who have legislative authority. These include:
- CDSS Board, CEO and staff
- CDSS working committee members
- Contracted service providers in relation to the delivery of the service
- As set out in the Privacy Act and any relevant state or territory legislation

Use of images

CDSS will seek your consent prior to any taking of a photo/image and the use of the photo/image. In some cases that consent may be implied, for example, the taking of photos at functions to be used in publications. If the photo or image contains sensitive information about a person (for example, information relating to their health), we will obtain the relevant person's consent to take the photo/image and specify the uses to which it may be put. This consent should be informed and freely given and signed by the individual whose information is to be collected and disclosed. Under the Privacy Act consents can be revoked at any time. If this occurs, we will take all reasonable steps to cease using the image or photo from the time the consent is withdrawn.

Use of de-identified information

As part of its services, CDSS may offer practices and/ or health professionals the opportunity to undertake quality assurance activities that require the collection of health information about individuals and disclose it to CDSS on a de-identified basis. Practice and/or health professionals providing de-identified data are advised what it will be used for and give us written consent for the data to be aggregated in feedback material provided to other health professionals or professional bodies. This aggregated de-identified data may also be used in our evaluation studies and reports. Data submitted to us is first encrypted and then transmitted via a secure protocol so that we are unable to identify the individual who is the subject of the data. Such information will be de-identified and remain confidential.

No sale of personal information

We do not supply or sell the personal information we collect to unrelated third parties for the purpose of marketing those third parties' products or services. Under no circumstances will CDSS sell or receive payment for disclosing your personal information.

Storage and security of personal information

CDSS takes steps to protect the security of the personal information it holds by:

- regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information
- taking appropriate measures to address those risks
- conducting regular reviews to assess whether CDSS has adequately complied with or implemented these measures.

Subscriptions on CDSS website

If you subscribe to any of CDSS's electronic publications, the personal information you submit through the subscription service form will be secure using SSL protocol used solely by CDSS and not be disclosed to any other individual or organisation. The records are kept within CDSS until the individual asks to be removed from the CDSS mailing list or does not respond to a request for confirmation of continued interest. There are security risks associated with transmission of information via the Internet. CDSS has taken reasonable steps to safeguard against unauthorised access, use, modification, or disclosure of the personal information CDSS holds electronically. Before deciding whether to use this subscription facility you should make your own assessment of the potential risks to the security of your information.

Accessing and correcting your personal information

Under the Privacy Act (APPs 12 and 13), you have the right to ask for access to the personal information that CDSS holds about you, and to ask that CDSS corrects that personal information. You can ask for access or correction by contacting CDSS's Privacy Officer by email to ross@creativdss.com.au. If you ask, CDSS must give you access to your personal information unless there is a law that permits or requires CDSS to refuse access. If your personal information is inaccurate, out-of-date, incomplete, irrelevant, or misleading, we will take reasonable steps to correct your personal information within 30 days of receiving and verifying your request. You will be asked to verify your identity before CDSS will give you access to your information or corrects any such information.

How CDSS will deal with your privacy complaint

If you wish to complain that CDSS has breached one of the Australian Privacy Principles, you can contact us on info@creativdss.com.au. CDSS will provide you with its response in writing. You may also contact the Office of the Australian Information Commissioner (OAIC). Generally, the OAIC will require you to give them time to respond before they will investigate. For further information call the OAIC on 1300 336 002.

Privacy Policy and Collection Statement

CDSS (ABN 88 247 513 178) collects and uses personal information in strict adherence with the Australian and as outlined in this Privacy Policy.