

Privacy Policy

Preamble

The Australian Association of Massage Therapists ABN 70 104 153 460 ("the Association") aims to protect your personal information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth).

Aim

This Privacy Policy describes the manner in which the Association collects, holds and uses personal information. If you wish to make any inquiries regarding this Privacy Policy you should contact the Association's Privacy Officer by telephone on 03 9602 7300, by email to privacy@massagemyotherapy.com.au or by writing to the following address: Level 8, 53 Queen Street, Melbourne, 3000

Process

What personal information do we collect?

"Personal information" is information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not. Personal information we collect may include (but is not limited to) the following:

- a) name, postal and email address;
- b) business details such as Australian Business Number;
- c) date of birth;
- d) contact details including telephone numbers (landline and mobile);
- e) gender;
- f) occupation, employment, training and qualification details (including Unique Student Identifiers);
- g) payment details including bank and credit card details;
- h) clinic details including clinic address and contact details;
- i) details about your practice including modalities;
- j) private provider numbers;
- k) insurance policy numbers;
- l) health information including dietary requirements and details of impairments or disabilities;
- m) criminal history;
- n) details of any complaints and history of disciplinary investigations and proceedings against former and current members; and
- o) details of any proceedings (including disciplinary proceedings) with any other professional association or a regulatory body.

When do we collect personal information?

The Association collects personal information from individuals and its members in a variety of ways. We may collect personal information about you when you contact us by telephone or email, through surveys, when you visit our website, complete an application form, lodge a formal complaints process or visit our offices in person.

The Association may also collect personal information about you via third parties such as one of our members or other third parties (for example, members' clients, the general public, other professional associations, regulatory bodies such as the Health Complaints Commissioner or health funds, in undertaking our audit, complaint resolution and investigation and dispute resolution functions). However, the Association will only collect your personal information in this way if it is unreasonable or impracticable to collect this information directly from you or if we are otherwise permitted by law to do so.

Where we engage with you multiple times over a short period of time in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

Information Collected via our Website

The Association will not collect any personal information about visitors to its website except when they knowingly provide it and as otherwise set out below in this Privacy Policy. For example, we will collect personal information from visitors to our website when they complete the "contact us" form located on our website or register to receive e-mail updates from the Association.

Google Analytics

We use Google Analytics to help analyse how you use our website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our website. Google will store this information. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personally identifiable information of visitors to our website. We will not associate any data gathered from this website with any personal information from any source as part of our use of Google Analytics.

If you do not want your website visit data reported by Google Analytics, you can install Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

Click Stream Data

When you visit and browse this website we or our website host will collect personal information for statistical, reporting and maintenance purposes. This information will not be used to identify you and may include:

- the number of users visiting this website and the number of pages viewed;
- the date, time and duration of a visit;
- the IP address of your computer;
- the path taken through this website; and
- any information downloaded.

We or our website host uses this information to administer and improve the performance of this website.

Cookies

Like many websites, our website may use 'cookies' from time to time. Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing

information about a user's identity, browser type or website visiting patterns. Cookies may be used to monitor web traffic, pages visited and some system information about the type of computer being used. The Association uses this information to enhance the content and services offered on our website.

If you access this website, a cookie may be downloaded onto your computers hard drive when you first log onto the website and it is automatically deleted from your hard drive after a period of thirty days. Cookies may also be used for other purposes on our website but in each case none of the information collected can be used to personally identify you.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change the different cookie preferences. If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

Web Beacons

Web beacons are images that originate from a third party site to track visitor activities. The Association may use web beacons to track the visiting and viewing patterns of individuals accessing its website or viewing and interacting with emails sent by the Association.

Third party content (eg social media links)

Some of the content on our website includes applications made available by third parties such as social media buttons or links that allow you to share content or links to our website through the relevant third party platforms. These third party applications themselves may facilitate collection of information by those third parties through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third party websites to understand their privacy practices and options they may make available to you in relation to their collection of your personal information.

What we use your personal information for

We use the personal information that we collect about our members to provide administration services to members, to contact them with Association information as part of their member benefits and services, to investigate complaints and conduct disciplinary investigations and proceedings, to inform members and complainants (including their representatives) of outcomes of any disciplinary investigations and proceedings, to conduct member audits, to act as third party administrator and provide details to the private health funds and other stakeholders including other professional associations and regulatory bodies such as the Health Complaints Commissioner, and as otherwise needed for our functions and activities. We may also provide details of any disciplinary proceedings, investigations or determinations against former and current Association members to representatives of any relevant complainants, to enforcement bodies, to a relevant court process, or to regulatory bodies such as the Health Complaints Commissioner. To avoid doubt, we may also provide a complainant's or their representative's details to the foregoing stakeholders.

Information that we collect from our members' clients may be used to market the services of our members and to gain a better understanding of your needs and the needs of our customers generally or to investigate a complaint from the client or general public.

You consent to the Association using your personal information in accordance with this Privacy Policy.

The Association may collect and use your personal information for other purposes not specified above. If we do so, we will make it known to you at the time we collect or use your personal information.

The Association will not otherwise collect, use or disclose your personal information without your permission, unless the collection, use or disclosure is:

- a) in accordance with this Privacy Policy or any agreement you enter into with us; or
- b) required or authorised by law, including without limitation the Australian Privacy Principles under the Privacy Act 1988 (Cth).

If you choose not to provide your personal information to the Association for the purposes set out in this Privacy Policy the Association or its members may not be able to provide you with information about, or offer you all of, its services.

Who do we disclose your information to?

The Association may disclose personal information about its members to health fund providers for the purpose of their role of providing provider rebates, to other professional associations, health fund providers, regulatory and enforcement bodies such as the Health Complaints Commissioner and the police, and relevant court processes to inform them of the status of former and current members of the Association (including, where relevant, complaints or disciplinary history, reasons for a member's changed membership status such as expulsion from the Association's membership for disciplinary action, and a complainant's details), to insurance companies to confirm insurance status or to the general public seeking referral. The Association may also disclose personal information to statutory bodies such as the police for the purpose of reporting or conducting ethics or complaints enquiries, or to other relevant industry regulatory bodies where appropriate.

The Association may disclose personal information about our members' clients to statutory bodies such as the police for the purpose of conducting ethics or complaints enquiries.

In the course of reviewing complaints against a member or conducting disciplinary reviews and proceedings, we may also share the member's personal information and relevant information about the complaint, investigation or proceeding (including its outcome) with other parties, including the representatives of the complainant(s), our professional advisers and insurers, any other person involved, affected clients, private health funds, other professional associations, regulatory authorities and enforcement bodies. To avoid doubt, the Association may disclose details about the complaint, investigation or proceeding to such parties even though a complaint, investigation or proceeding is still in progress or a determination has not been finalised and even if the individual has ceased to be a member of the Association.

We may also disclose your personal information to our web site host in certain limited circumstances, for example when our web site experiences a technical problem, to ensure that it operates in an effective and secure manner.

Unless otherwise specified in this Privacy Policy, our web site host will not disclose any of your personal information to any other organisation unless the disclosure is made with your consent, is

required by law, or is otherwise permitted by law (including the Australian Privacy Principles under the Privacy Act 1988 (Cth)).

We may disclose, or provide access to, your personal information to third parties in connection with the purposes described in this Privacy Policy, such as in respect to our rewards program with Infinite Rewards and our CRM provider, Markinsons. The Association and any third parties may be located anywhere within Australia from time to time, or overseas as set out under "Overseas disclosure", below. Depending on the nature of your engagement with us, we may disclose your personal information to our members, to third parties that provide products and services to us or through us, or to other third parties.

Overseas disclosure

Some of your personal information may also be transferred, stored, processed or used interstate or overseas by us or by third party service providers. This may happen if our related entities are interstate or overseas, if we outsource certain activities or if transactions, information services have an interstate or overseas connection. You consent to the collection, use and storage, and processing of your personal information within or outside of Australia.

In particular, your personal information may be disclosed to third party service providers which may store your personal information in the Philippines, Canada, Singapore, United States of America, Fiji and such other countries in which those parties or their, or our, computer systems may be located from time to time, where it may be used for purposes described in this Privacy Policy without us being responsible under the Privacy Act 1998 (Cth) for such use (or for any breach). In these circumstances, you consent to the collection, use, storage and processing of your personal information in those countries. Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you may not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information.

Marketing

The Association may use your personal information to provide you with promotional material about the Association or the services offered by its members. You consent to us sending you such information by means of direct mail, email, SMS and MMS messages. If you do not wish to receive this type of promotional information, you can follow any instructions provided in the message, contact our Privacy Officer on 03 9602 7300 or email privacy@massagemyotherapy.com.au at any stage in the future so that we can remove your name from our marketing lists.

You can have access to the information the Association holds about you

You are entitled to access personal information that the Association holds about you. If you request access to your personal information, we will grant your request unless providing you with access would unreasonably impact upon the privacy of others or where we are otherwise permitted not to provide access by law, including under the Australian Privacy Principles.

If we refuse your request to access your personal information, we will provide you with reasons for our refusal except in circumstances where we may be permitted by law not to provide reasons.

A request for access can be made by contacting the Association's Privacy Officer on 03 9602 7300 or email privacy@massagemyotherapy.com.au.

Keeping your personal information secure and up to date

The Association aims to keep your personal information secure and up to date.

Any personal information that is collected via the Association's website or which is held on the Association's computer systems is protected by firewall security systems and the use of user passwords to prevent unauthorised access.

The Association does not collect sensitive or financial information about its customers via its website.

You can update your personal information at any time by logging into the Members Only area of the Massage & Myotherapy Australia website and updating your personal information there, by emailing info@massagemyotherapy.com.au or by writing to Massage & Myotherapy Australia requesting an update. We would welcome any changes to your details so as to keep our records up to date. If we find we have no further need for your personal information we will remove it from our system and destroy all record of it.

Questions, problems, or complaints about our use of your personal information or this Privacy Policy

If you feel that your privacy has not been respected or that we have conducted ourselves inconsistently with this Privacy Policy, or for any other queries in relation to this Privacy Policy, please contact our Privacy Officer in one of the following ways:

- by telephone on 03 9602 7300;
- by email to privacy@massagemyotherapy.com.au; or
- by writing to the Privacy Officer at the following address:
Level 8, 53 Queen Street, Melbourne, 3000.

The Association will investigate your queries and complaints within a reasonable period of time. We may require you to formally submit privacy complaints in writing. Depending on the nature of the complaint it may be reviewed by the Association's senior management, and the National Ethics Committee may also be consulted. We will notify you of the outcome of our review and our proposed resolution.