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## Australian Dental Association NSW & Filling the Gap Ltd. Privacy Policy

Who we are:

The Australian Dental Association NSW (ADA NSW) is a not-for-profit professional membership organisation committed to the improvement of public oral health and the art and science of dentistry more broadly. Our membership is predominantly based in Australia and is comprised of practicing dentists, students of dentistry and retired dentists.

Filling the Gap Ltd. is a registered charity with the Australian Charities and Not-for-profits Commission. It provides pro bono dental treatment to those who cannot access mainstream services. Our commitment to privacy:

ADA NSW and Filling the Gap support a robust privacy culture. We collect and manage [personal information](#) in accordance with the Australian Privacy Principles (APPs) and other requirements of the *Privacy Act 1988*. \*\*

This Privacy Policy forms part of our broader Terms & Conditions. It explains how we collect, use, disclose, secure and otherwise deal with the personal information of our members and other individuals who access ADA NSW and Filling the Gap – whether in person, at ADA NSW/Filling the Gap events, via the websites or other channels we promote (such as social media pages and feeds).

Why we collect personal information, how we do it and what it includes:

ADA NSW and Filling the Gap support and deliver a range of products and services in the interest of dentistry and oral health in Australia. Our activities are well articulated on our website and include, but are not limited to:

- Membership activation
- Updating personal and practice information of our members
- Membership renewal
- Continuing professional development for members
- Advertising employment opportunities in the dental industry
- Community “find a dentist” service
- Practice accreditation
- Scholarships and grants
- Events promotion and attendance
- Supporting volunteer initiatives
- Publications and subscriptions
- Handling complaints about practitioners and other matters

[adansw.com.au](http://adansw.com.au)

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**Australian Dental Association**  
NSW Branch ABN 34 000 021 232

**Address**  
L1, 1 Atchison Street,  
St Leonards NSW 2065

**Phone**  
02 8436 9900

**Email**  
[adansw@adansw.com.au](mailto:adansw@adansw.com.au)



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We collect your personal information in a variety of ways, depending on the nature of a particular service and/or how you've chosen to engage with us, including:

- Face to face contact
- Telephone calls
- Voice or image recordings
- Social media messages, posts or feeds
- Via the ADA NSW and Filling the Gap websites
- Electronic surveys
- Email correspondence
- Fax correspondence
- Postal correspondence
- Hard-copy forms
- Via data transfer from the Australian Dental Association Inc. (ADA), Australian Dental Health Foundation and ADA State/Territory branches

The personal information we collect relates directly to the nature of your engagement with us and may include:

- Contact details (who you are and how we can reach you)
- Relevant demographic details (such as your age and gender)
- Education information (such as your educational qualification and the name of the university you received your qualification from)
- Professional details (including your specialty and CPD status)
- Employment details (including whether you are currently employed and the business details of your employer)
- Activities or areas of involvement with the ADA NSW (such as what you want to get out of your membership and what we are doing for you)
- Financial or payment related information

Some of the personal information we collect is considered sensitive information under Australian privacy law, including:

- Your ADA membership status
- Idiosyncratic information relevant to our activities (where, for example, it identifies your racial or ethnic origin or philosophical beliefs)

In most cases, we collect your personal information directly from you. Sometimes we may ask a contracted third party to collect it from you on our behalf (such as when you complete a survey).

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There may also be specific lawful, operational or technical requirements to collect your personal information from someone other than you (such as when we verify your educational qualifications during a scholarship application process).

How we use your personal information, and to whom we give it:

#### *General*

At the time of collecting your personal information, we endeavour to always explain what we need it for, how it will be used and to whom we may give it (via a Collection Statement on our hard-copy or web based forms, recorded message, verbally or by other means). Once your personal information has been collected, we do not otherwise use or disclose it except where we are required or authorised by law to do so.

Our ability to provide a service may involve sending personal information to a contracted third party. For instance, if you sign up to receive ADA NSW/Filling the Gap publications, we will need to supply your mailing and other relevant contact details to the organisation that packages and delivers the publications to you.

From time to time, there may be a new purpose for which we would like to use or disclose the personal information we already have about you (for example, a research project, funding application, public awareness campaign or article featuring you). If this happens, we will ask your permission first.

#### *Social media:*

ADA NSW and Filling the Gap support using your preferred form of communication. If you choose to engage with ADA NSW/Filling the Gap using our social media pages or feeds, please be aware that any personal information you supply in that arena may be:

- Available for the user group to see (which may be a public or private group, depending on the social media platform being used)
- Able to be “screen shot” and potentially downloaded by anyone in the user group and is, thus, uncontrolled
- Subject to the privacy settings and privacy policy available on the relevant platform

#### *Third parties:*

ADA NSW/Filling the Gap have contractual relationships with third parties who have visible privacy practices that align with our obligations under Australian privacy law. These include:

- *Cloud “infrastructure as a service” (IaaS) services*

Our IaaS provider, Amazon Web Services (AWS) supplies web hosting and customer relationship management (CRM) services. Details about AWS’ privacy and security protocols can be accessed [here](#) and in an [additional FAQ](#).

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Personal information collected and managed by AWS on our behalf is stored securely in Australia.

- *Secure payment services*

Our secure payment provider, PayPal, is accessed via a gateway from the ADA NSW and Filling the Gap websites. We use PayPal's Payflow service. Our [service agreement](#) articulates that privacy considerations are dealt with in accordance with PayPal's [privacy policy](#).

Personal information collected and managed by PayPal on our behalf is stored securely in Australia.

- *Surveys*

Our survey services are provided by reputable suppliers including, but not limited to, ACA Research, Survey Matters, Taverner's Research and Survey Monkey. Surveys are most often conducted online, however may also be conducted over the telephone or by post.

All members are asked to consider participating in ADA NSW/Filling the Gap surveys so that we can continue to offer meaningful and relevant services, as well as improve our practices to meet member expectations. Participation in any ADA NSW/Filling the Gap survey is entirely optional and members are encouraged to familiarise with the privacy policy of the relevant survey supplier before providing any information – personal or otherwise.

- *Publication services*

#### Mail-outs and other publications

ADA NSW/Filling the Gap use mailing house, Rawson Print Co. to package and distribute by post a variety of published material for our members. Rawson Print Co. privacy practices are explained in their privacy policy and can be obtained from their website <https://www.rpco.com.au/> or by contacting Rawson Print Co. by telephone (02 8873 2500)

Personal information collected and managed by Rawson Print Co. on our behalf is stored securely.

#### *Links to other websites*

The ADA NSW and Filling the Gap website may provide links to information, resources and services available on other websites. When you link to other websites, you are leaving the ADA NSW/Filling the Gap website and your personal information will be handled in accordance with the privacy policies of those websites.

We do not share your personal information with other websites and we do not track your external website browsing history.

#### *Cookies*

The ADA NSW and Filling the Gap websites deploy cookies in a limited manner, in accordance with our Cookie Policy <https://www.adansw.com.au/About/Terms>

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## Information security

### *General*

Our Privacy Officer works to ensure that ADA NSW/Filling the Gap staff observe best practice in their handling of personal information. The physical and technical security of personal information held by ADA NSW/Filling the Gap is managed by our dedicated Information Security (IS) team.

### *Data Breach Notification*

A data breach is the unauthorised access to, disclosure or loss of personal information. Breach events are not confined to online or electronic systems. Our Data Breach Notification policy and procedures are managed internally by our Privacy Officer and IS team.

If you believe that ADA NSW or Filling the Gap has experienced a data breach, please contact us by telephone (02 8436 9900), by email ([reception@adansw.com.au](mailto:reception@adansw.com.au)) or in writing ADA NSW Privacy Officer, c/o Level 1, 1 Atchison Street ST LEONARDS NSW 2065.

## Anonymity

If you engage with ADA NSW or Filling the Gap in order to receive services associated with your professional membership, we cannot deal with you anonymously.

There are, however, times when it appropriate for us to ensure your personal information is de-identified before we use it, such as when we receive survey data about our members from our contracted survey provider(s). Survey data is de-identified before we are able to receive, view, use and/or publish the results.

There are also times when it may be appropriate for members and other individuals to contact us anonymously. This may include:

- Raising an Australian Health Practitioner Regulation Agency (AHPRA) or Dental Board of Australia (DBA) issue – which would generally require that you deal with those bodies directly
- Raising a concern or complaint about a dentist
- Complaints or comments about ADA NSW/Filling the Gap where you do not expect an “in person” response

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## Access to/amendment of your personal information

It is your right under Australian privacy law to request access to the personal information we hold about you. It is also your right to request that we amend the information in cases where it is out-of-date, incomplete, incorrect or misleading.

If you are a member, you can access and amend your personal information (account details) by logging in to the members area of the ADA NSW website or by contacting the Membership Team on 02 8436 9921.

If your request relates to personal information not available to you through the member's area, please contact us by telephone (02 8436 9921), by email ([membership@adansw.com.au](mailto:membership@adansw.com.au)) or in writing ADA Membership Officer, c/o Level 1, 1 Atchison Street ST LEONARDS NSW 2065.

When you ask ADA NSW or Filling the Gap for access to personal information, we may:

- Ask you to verify your identity (to ensure you are the person to whom the information relates)
- Ask you to pay a reasonable fee to cover the cost of access (if, for example, we are required to access our archives to find the information). In most cases, however, access is provided free of charge.
- Lawfully refuse to provide you with access where the privacy rights of another person would be impinged.

We will aim to respond to requests for access and/or amendment of personal information within 28 days of receiving the request.

## Privacy complaints

If you believe that ADA NSW/Filling the Gap has not collected or handled your personal information in accordance with the *Privacy Act 1988*, you can complain to us by doing the following:

- Contact us by telephone (02 8436 9900), by email ([reception@adansw.com.au](mailto:reception@adansw.com.au)) or in writing (ADA NSW Privacy Officer, c/o Level 1, 1 Atchison Street ST LEONARDS NSW 2065) in the first instance. We will respond to you within 28 days.
- You may then be asked to complete our Privacy Complaint Form and/or provide additional information in relation to the complaint.

In dealing with your complaint, we will communicate time frames to you based on the nature and complexity of your concern and will do our utmost to adhere to these.

If you are dissatisfied with our response to your privacy complaint, please contact the Office of the Australian Information Commissioner (OAIC) for further advice by telephone (1300 363 992) or by visiting their website ([www.oaic.gov.au](http://www.oaic.gov.au)).

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## Updates to our Privacy Policy

ADA NSW will review and update this Privacy Policy as required to ensure that it accurately reflects our privacy practices. Last updated: February 2019

\*\* With respect to our members and other individuals that may engage with us from overseas: In acknowledgement of the rapidly changing face of global privacy, we are working to align our privacy program with the requirements of the European Union's General Data Protection Regulation (GDPR).

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