



SARRAH

Services for Australian Rural and Remote Allied Health

SARRAH Privacy Statement

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Introduction

The Services for Australian Rural and Remote Allied Health Ltd (ACN 088 913 517 / ABN 92 088 913 517) (SARRAH, We, Us, Our) collects, stores, discloses and uses a range of personal information.

SARRAH's key purpose is to lead rural and remote allied health workforce and service development.

We collect a range of personal information from members and non-members directly to enable Us to manage membership needs, administer grants and Continuing Professional Development (CPD) Programs, conduct events and provide information about rural and remote health and other related products and services in order to promote the health interests of the rural and remote Australia, according to the objects of our [Constitution](#).

We collect, hold, use and disclose personal information for the purpose of carrying out Our functions and activities, in accordance with the [Privacy Act 1988 \(Cth\)](#) (the **Act**) and the Australian Privacy Principles (**APPs**), which are contained in Schedule 1 of the Act.

General Principles

SARRAH will:

- (a) collect only information which is directly relevant and necessary to enable Us to carry out Our key organisational functions and responsibilities;
- (b) ensure that people are informed as to why We are collecting their personal information and how We administer the information gathered;
- (c) use and disclose personal information only for the functions and activities of the SARRAH for which the information was provided, or for a directly related purpose;
- (d) obtain consent from the individual concerned before disclosing personal information for a reason other than the one for which it was collected;
- (e) provide individuals, on request, with access to the personal information that is held about them, and respect their right to seek its correction;
- (f) where practicable, provide the option for an individual to withhold their name or use a pseudonym when dealing with the SARRAH;
- (g) store personal information securely, protecting it from unauthorised access, modification or disclosure and against misuse and loss; and
- (h) review personal information regularly to ensure that it is accurate and up-to-date and confidentially destroy information that is no longer required.

Collection of information

Personal information means "Information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. Whether the information or opinion is true or not; and
- b. Whether the information or opinion is recorded in a material form or not".

[\(Source: Office of the Australian Information Commissioner\)](#)

The personal information We collect may include but are not limited to your:

- (a) name;
- (b) date of birth;
- (c) country of residence;
- (d) proof of identity;
- (e) job title;
- (f) organisation/employer;
- (g) email address;
- (h) postal address;
- (i) phone numbers;
- (j) web address;
- (k) photograph;
- (l) biography; and
- (m) credit card details.

How is personal information collected?

The main way We collect personal information about you is when you give it to Us, including by:

- a) providing Us with the information through an online or paper-based form for our CPD or Project activities;
- b) registering for SARRAH events, summits and conferences;
- c) join/renew your SARRAH membership;
- d) SARRAH Surveys;
- e) make a donation;
- f) sign up to Our email list;
- g) sign up for Our marketing communications; or
- h) request Us to add you to Our database.

Personal information is also collected through Our website, mobile applications and by other electronic channels.

You acknowledge and accept that for Us to perform Our activities and functions, your personal information must be provided and must be correct and up to date.

Personal information may also be collected where We are required or permitted to do so by law.

If we receive unsolicited personal information about you, it will be handled in accordance with the Act.

Disclosure and use of personal information

1. SARRAH recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – i.e. protected on the one hand, and made accessible to them on the other. These privacy values are reflected in and supported by Our core values.
2. As a guiding principle, We do not disclose personal information unless you agree or would expect Us to. You have a right to ask for access to the personal information We hold about you and ask Us to correct any incomplete or incorrect information.

3. We will make you aware at the time of collection of your personal information, how We intend to use and disclose that personal information and may also use and disclose your personal information to enable Us to perform and undertake Our activities and functions.
4. We will only use personal information in accordance with the purpose for which it was collected. We may also use personal information where:
 - (a) Consent: when you have subscribed to receive information from Us;
 - (b) Performance of a contract: (or in order to take steps prior to entering into a contract) e.g. for processing payments, registrations or memberships; or
 - (c) Compliance with law: In some cases, We may have a legal obligation to use or obtain your personal information.
5. We may also make secondary use or disclosure of your personal information, in addition to Our activities and functions, where:
 - (a) you would reasonably expect Us to for a related purpose;
 - (b) it is authorised or required by the Act, or any other Australian law or court/tribunal order; or
 - (c) you have consented to Our use and disclosure of your personal information.
6. We do not sell your personal information to third parties, but it may be disclosed to third parties from time to time in relation to Our activities and functions.
7. We will not disclose any sensitive information about you, unless you have provided express consent for Us to do so, or We are required or authorised by law.

To whom We disclose your personal information

SARRAH does not share personal information with third parties except when required to when managing events and/or programs. For example, with Our ecommerce provider for processing credit card payments, providing venues with dietary requests, and with travel agencies for travel and accommodation bookings.

Any organisations which access your information in the course of providing services on Our behalf will be governed by strict contractual restrictions to make sure they adhere to all data privacy laws that apply. SARRAH will independently audit these service providers to make sure they meet our standards.

We will not share your personal information with anyone else for their own marketing purposes unless We have your permission to do so.

Overseas

We may disclose personal information to overseas parties using secured cloud services from time to time, the location of which is not reasonably available.

If We disclose personal information overseas, We will take reasonable steps to ensure that any overseas recipient does not breach the Act and the APP.

Unsubscribing and opting out

If you do not wish to receive communications from SARRAH, you may request to cancel such communication by:

- a) unsubscribing to an email newsletter at any time; or

- b) contacting SARRAH at any time via telephone, mail or email using the SARRAH contact details indicated at the end of this document.

Anonymity and Pseudonymity

You may have the option of not identifying yourself or using a pseudonym when dealing with SARRAH, however, on some occasions it will be impracticable to do this and it may prevent Us from carrying out Our functions and activities. There may also be instances where we are required or authorised by or under the Act, or by a court/tribunal order to deal with individuals who have identified themselves. You will be notified if this is the case.

You acknowledge and accept that in most instances, We cannot practically provide services to a person who wishes to engage with Us, but who is not prepared to identify themselves.

Storing and keeping your information safe

SARRAH will:

- take all reasonable steps to protect your personal information from misuse, interference, and loss and unauthorised access, modification or disclosure;
- store all personal information in a secure database and maintain strict protocols for access and storage of such information;
- ensure that staff securely handle and store your personal information in a manner which complies with the Act and the APPs. Staff will be required to ensure that any such personal information available to them is protected from theft, damage, loss, unauthorised access and any other form of abuse or improper use.
- implement appropriate technological and organisational controls to protect your personal information against unauthorised processing and against accidental loss, damage or destruction; and
- work with service providers or third parties who perform services for Us, to require them to comply with Our Privacy Policy.

How long We keep your personal information

SARRAH keeps personal information for only as long as is needed. This includes for as long as you continue to consent to be on Our database, or We need to keep it for reporting and analysis purposes.

SARRAH may also need to keep your personal information for accounting or other lawful purposes. At any time, you may request for Us to make your record anonymous by removing all details that identify you. Where appropriate and to the extent required by law, we will consider all requests to delete or de-identify your personal information.

Website and App

We may collect the following information through Our website and app, either ourselves or through Google Analytics (which is hosted by a third party):

- (a) your computer or device's IP address (collected and stored in an anonymised format);
- (b) device screen size, device type, operating system and browser information;
- (c) geographic location (country only);

- (d) referring domain and out link if applicable;
- (e) search terms and pages visited (clickstream data); and
- (f) date and time when website pages were accessed.

We will treat any personal information collected through Our website and app in the same way as other personal information We collect.

Links to other websites

Our website and app contain links or references to other websites or organisations. We are not responsible for the privacy practices or content of the linked web sites.

Third party websites may have their own privacy and security policies, which We encourage you to read before supplying any personal information to them.

Links to third party websites are provided for information, and do not indicate Our endorsement of that business or any assurances about the content on that site.

Correcting your personal information

We will take reasonable steps to ensure the personal information We have about you is correct. If any of your personal information is incorrect, you may contact Us using the details set out at bottom of this document to correct your personal information. Further, you can provide extra information at any time by contacting Us using SARRAH contact details.

If We refuse to correct your personal information, We will provide you with written notice that sets out Our reasons (other than to the extent it would be unreasonable to do so) and inform you of how to complain about the refusal.

If We refuse to correct your personal information, you may request that We make a record of your claim that the personal information is inaccurate, out-of-date, incomplete, irrelevant, or misleading. We will take reasonable steps to associate the record in such a way that will make it apparent to users of the personal information.

Access to personal information

You can contact Us if you would like to access the personal information, We hold about you. We will request that you verify your identity before We provide you with access to your personal information.

We will provide you with access to your personal information, within a reasonable period after the request, and in a way that is reasonable in the circumstances, unless exempted by the Act.

We may refuse to provide you with access to your personal information, or to provide access in the manner you have requested in circumstances where an exception to access applies under relevant APP.

If We refuse to provide you access to your personal information, We will provide you with written notice that sets out Our reasons (other than to the extent it would be unreasonable to do so) and inform you of how to complain about the refusal.

We may charge a reasonable fee for providing you with access to your personal information, which will be confirmed at the relevant time.

Notifiable data breaches

A data breach is defined as the situation when personal information is accessed or disclosed without authorisation or is lost. Under the Privacy Act 1988, SARRAH will notify any affected individuals as well as the Office of the Australian Information Commissioner if the following occurs:

- there is unauthorised access to or unauthorised disclosure of personal information, or a loss of personal information.
- this is likely to result in serious harm to one or more individuals; and
- SARRAH hasn't been able to prevent the likely risk of serious harm with remedial action.

Direct marketing

If We have your permission, We may send you materials We think may interest you, such as the weekly newsletter, conference calls for abstracts or registration opening, seeking contributions for Our submissions and publications or any other information We deem to be of interest.

We do not use or disclose your sensitive information for the purpose of direct marketing without your consent.

Any direct marketing will be conducted in accordance with the Act and other applicable legislation, regulation, or enactment.

Responding to your queries or complaints

You may make a complaint about how We have handled your personal information by contacting Us using the SARRAH Contact details.

If you have raised a query or a complaint with Us, We may contact you to answer your query or to resolve your complaint.

If you are not satisfied with our response to any concerns you may have raised, you can obtain more information about privacy or make a complaint to the Office of the Australian Information Commissioner at www.oaic.gov.au. If you lodge a complaint with the Office of the Australian Information Commissioner, or another regulatory body, We may use and disclose your personal information to assist in any resulting investigation or proceeding.

Contact details

If you have a concern or would like to provide feedback about any aspect of SARRAH's Privacy Policy or you wish to make a complaint about how your personal information is handled by SARRAH, please contact Us by email sarah@sarah.org.au by telephone on 1800 338 061.

SARRAH Postal Address:

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