

### **Purpose**

1. The purpose of this policy is to describe how eviDent will collect, use, store, disclose and de-identify your personal information.

### **Who we are**

2. The eviDent Foundation is a health promotion charity supporting Australia's only dental practice based research network.
3. The object for which eviDent is established is to promote the prevention and control of dental and oral diseases in human beings by:
  - a. supporting dental practice based research into dental and oral disease;
  - b. providing information about dental and oral disease, their prevention and control, to sufferers, health professionals and the general public;
  - c. developing or providing relevant aids and equipment to sufferers of dental and oral disease;
  - d. conducting and promoting scientific research about how to detect, prevent or treat dental and oral disease;
  - e. training health professionals to conduct scientific research about dental and oral disease;
  - f. evaluating health programs and processes to prevent or control dental and oral disease;
  - g. training health professionals and carers in methods of controlling dental and oral disease;
  - h. developing and implementing co-operative and cross-disciplinary approaches to the treatment and prevention of dental and oral disease;
  - i. seeking funds from grant-giving bodies, trusts, foundations, corporate sponsors, members of the dental community and public; and
  - j. doing all other lawful things that are incidental or conducive to achieving its object.
4. In this policy:
  - a. 'eviDent', 'we' and 'us' refers to the eviDent Foundation (ABN 81 152 078 487)
  - b. 'you' and 'your' refers to any individual who engages with or contacts us in relation to the eviDent services.

### **Our commitment to Privacy**

5. eviDent Foundation is bound by the Privacy Act 1988 (Cth) (Privacy Act) in managing the collection, use, storage and disclosure of personal information (including any sensitive information). eviDent takes its privacy obligations seriously and is committed to best practice in managing personal information gathered from members and non-members (including supporters, donors, volunteers, sponsors) in the course of your dealings with us and ensuring the security and protection of that personal information.
6. This Privacy Policy provides details about how eviDent collects, uses, stores, discloses and otherwise handles your personal information in accordance with its obligations under the Privacy Act, and in accordance with other applicable privacy laws.

7. By engaging with us, visiting our website or other social media channels or feeds that we promote, attending our events, or providing us with your personal information, you agree to your personal information being collected, used, stored and disclosed on the terms set out in this Privacy Policy.
8. In this Privacy Policy, '*personal information*' has the same meaning as in section 6 of the Privacy Act:  
*'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.*
9. Participants in eviDent's research projects are not subject to this Policy because the terms under which their personal information is collected, stored and used is determined by the Human Research Ethics approval for the relevant eviDent project(s) in which they take part. eviDent project participants who wish to discuss the collection and use of their personal information are advised to contact that project's Chief Investigator.

### **Relevant legislation**

10. When dealing with your personal information we observe our obligations under the Privacy Act 1988 (Cth) and comply with the Australian Privacy Principles, as well other relevant legislation, including the:
  - a. Healthcare Identifiers Act 2010 (Cth);
  - b. Health Records Act 2001 (Vic); and
  - c. Spam Act 2003 (Cth).

### **The Collection of your personal information**

11. The personal information we collect is only for purposes directly related to your engagement with us, and only where that use is permitted by the Privacy Act, or other legislation. We outline below the types of personal information collected by eviDent in providing the eviDent Services, how that personal information is collected and the purposes for which that personal information might be used and disclosed by us.

### **The types of information we collect**

12. The types of personal information that we collect will ultimately depend on the types of interactions that you have with us, but may include:
  - a. Contact details about you (your name, address, professional information, telephone numbers, email); and
  - b. Demographic information (gender, date of birth);
  - c. Professional Information (your professional qualifications, area of specialty, details of your continuing professional development activities);
  - d. Employment details (including business details of your current employer, if applicable)
  - e. Financial information (for example, credit card numbers or bank account details to facilitate payment for donation and events)

- f. Activities (Participation in eviDent, other dental and community activities and events); and
  - g. Your preferences, interests and behaviour relating to the eviDent Foundation
13. We may also collect information from you which is considered sensitive information under the Privacy Act, including:
- a. information about membership of a professional association;
  - b. Information relevant to your activities and engagement with eviDent which may identify your racial or ethnic origin, religious or philosophical beliefs or affiliation with political associations.

#### **Why we collect information about you**

14. We collect information about members and others which enables us to communicate with them, introduce them to our organisation and inform them of the work we do.
15. We do not use the information in any way other than in the furtherance of our objects and purposes.
16. We might also use your information for the following purposes:
- a. For the immediate reason for which you have provided it to us (for example, to enable eviDent to process your request, payment, registration, subscription, access to or delivery of service, etc.);
  - b. To maintain contact with you about eviDent's work, to report to you about eviDent's work, or to encourage you to learn about what eviDent does;
  - c. Any other purpose directly related to our work and for which you have provided consent (where it is reasonably required by law);
  - d. To disclose your contact details to the types of organisations to whom we normally do business including:
    - i. Mailing houses for delivery of eviDent or other related publications to you;
    - ii. Entities engaged by eviDent to undertake surveys or to collect practice or other data from you on our behalf; and
    - iii. Approved organisations such as affiliated societies, sponsors or partners for the purpose of promoting products for which the eviDent Foundation is directly affiliated.
17. We don't rent, sell or exchange your information.
18. We take all reasonable steps to ensure that these organisations are in turn bound by confidentiality and privacy obligations when handling your personal information.
19. If you don't want your personal information disclosed to another organisation, please inform eviDent at either the time we collect your information or any later time.
20. Sometimes we may be legally required to disclose your information, for example, to government departments. Such information would only be disclosed if legally obligated to do so.

21. We may also sometimes share non-personal, non-sensitive and de-identified information with other research organisations, and/or stakeholders.

#### **How we collect your information**

22. We may collect personal information directly from you in a number of ways, including:

- a. by email and postal correspondence;
- b. Over the telephone;
- c. via voice or image recordings and SMS messages;
- d. through written correspondence with you;
- e. through the completion of forms (electronic or hard copy);
- f. when you access our services;
- g. in person interactions with you;
- h. through our website;
- i. via messages and conversations posted on our social media channels, posts and feeds;
- j. at events or when delivering eviDent services;
- k. from third parties such as our service providers and suppliers;
- l. communication apps.

23. Where we collect information from third parties, and it is not personal information that is contained in a Commonwealth record, we will take reasonable steps to destroy or de-identify the information as required by law.

#### **Collection of your personal information via the website**

24. Our website uses cookies to help personalise your online experience.

25. A "cookie" is a small text file stored on your computer's browser which assists in managing customised settings of the website and delivering content. All visits to the eviDent Foundation website are logged. We may use cookies to collect non-personal information such as your IP address and/or domain name, the device and type of operating system or browser being used, pages you have accessed on our website, access times, dates and length of visits, referring website addresses and the resources accessed, webpages visited and documents downloaded. Cookies cannot be used to run programs or deliver viruses to your computer. You are not identifiable from such information. This information is used by eviDent for website administration, statistical and maintenance purposes.

26. You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages, content or the interactive features on our website.

27. eviDent uses Google analytics to monitor the visitors to our website. Based on your interactions with our website, Google and third party sites may elect to show you content and advertising that directs back to our website.

### **How we use your information**

28. eviDent requires your personal information to be able to perform its core functions. We only use your personal and sensitive information for the reason we collect it as set out above and for the purpose(s) for which it was collected, or as otherwise permitted by law.
29. We will not disclose the above information that we collect to affiliates without your consent.

### **Disclosure of your personal information to third parties**

30. eviDent may be required to disclose your personal information to third parties where necessary to complete a request from you or to carry out a service. Examples of circumstances where we may disclose your personal information to third parties include to:
- a. mailing houses for delivery of eviDent services, membership or other publications;
  - b. entities engaged by eviDent to:
    - i. undertake research; or
    - ii. to collect information about the dental practice you work in; or
    - iii. perform data processing and analysis;
  - c. approved organisations such as sponsors or partners for the purpose of promoting products or services for which eviDent is affiliated;
  - d. to our secure payment provider, Stripe, to facilitate donations;
  - e. other organisations, with which eviDent has agreements for the delivery of specified services; and
  - f. in certain circumstances eviDent may be legally obligated to disclose your personal information, for example to government departments, where permitted by the Australian Privacy Principles.
31. eviDent does not rent, sell or exchange your personal information. We do not give your personal information to other organisations, agencies or individuals without your informed consent unless one of the following exceptions applies:
- a. we believe you would reasonably expect, or have been told, that information of that kind is usually passed on to those individuals, bodies or agencies as a matter of standard practice;
  - b. the disclosure will prevent or lessen a serious and imminent threat to somebody's life or health; or
  - c. the disclosure is otherwise required or authorised by law.
32. eviDent takes all reasonable steps to ensure that any third party organisations to whom your personal information is disclosed are in turn bound by confidentiality and privacy obligations that align with our obligations under the Privacy Act.
33. eviDent may, from time to time, contact you on behalf of affiliates about a particular offering that we believe may be of interest to you. In those circumstances, your personal information is not transferred to the third party.

34. eviDent may share aggregated and de-identified personal information with research organisations and with the Australian Dental Association Victorian Branch (ADAVB).

#### **Overseas transfer of your personal information**

35. eviDent may disclose your personal information to overseas recipients. We will do so in compliance with the requirements of the Privacy Act. In this event, eviDent will, where practicable, advise individuals of the countries in which any overseas recipient is likely to be located.

#### **Data quality and security**

36. The security of your personal information (and sensitive information) is important to us.
37. The eviDent website and secure-access member website is hosted in Australia. If you choose to provide us with personal information, you are consenting to the collection, use, disclosure of personal information in the manner outlined in this Privacy Policy and the storage of that personal information on our servers located in Australia.
38. The personal information (and sensitive information) provided to us is stored in electronic databases. In some instances, information may also be stored in physical paper-based files held in locked facilities and in appropriate circumstances archived and stored offsite.
39. We take reasonable steps to ensure your personal information is stored securely and protected from misuse, interference and loss, and from unauthorised access, modification and disclosure. These steps include:
- (a) using secure payment gateways for the processing of any payments;
  - (b) using encryption technology (such as Secure Socket Layer (SSL) protocol) to protect personal information when it is being transmitted to other websites, or stored by us;
  - (c) using technical security for information storage facilities including login, password protection and encryption, web-filters, firewalls and anti-virus software;
  - (d) access to personal information is restricted to personnel who require that information to perform their assigned roles;
  - (e) the office WIFI system is routinely monitored for security purposes and logs are maintained of all network activity; and
  - (f) in circumstances where we no longer require your personal information for the purpose for which it was collected (or any related purpose), and where we are not required to retain it by legislation, we will de-identify it or destroy it in a secure manner.

#### **Web privacy**

40. Links to other websites
- a. Our website may contain links to third party websites, and third party websites may also have links to our website.

- b. The eviDent Privacy Policy does not apply to external links or other websites. The operators of other websites may collect your personal information.
- c. We encourage you to read the privacy policies of any website you link to from our website.

### **Anonymity**

- 41. It is your right to be dealt with anonymously, provided that it is lawful and practicable.
- 42. We will try to accommodate a request for anonymity wherever possible; however we note that in some circumstances, this may prevent us from practically and effectively communicating with you. If this is the case we will notify you.

### **Use and disclosure of your personal information for direct marketing**

- 43. We may use or disclose your personal information for the purpose of marketing, informing you about our services, upcoming promotions, continued professional development activities, training and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by using the opt-out facility that will accompany every communication of this kind or by contacting our Privacy Officer (see details below).
- 44. If you opt-out of receiving marketing materials from us, we may still contact you in relation to our ongoing relationship with you.
- 45. We will not disclose your personal information to third parties for marketing purposes without your consent.

### **Accessing and correcting your personal information**

- 46. eviDent takes reasonable steps to ensure that personal information it collects is accurate, up to date and complete.
- 47. If you request access to the personal information that we hold about you, or request that we change that personal information, eviDent will allow access or make the requested changes unless we consider there is a sound reason under the Privacy Act or other relevant law to withhold the information, or not make the change
- 48. In some cases, we may also ask you to pay a reasonable fee to cover the cost of access.
- 49. If you have a question about this privacy policy, or want to access your personal information you can contact the eviDent Privacy Officer on 03 8825 4600 or alternatively send an email (to [ask@evident.net.au](mailto:ask@evident.net.au)). We will aim to respond to you within 28 days of receiving your request. If we're not able to help with your request, you will receive a written explanation as to why.
- 50. Occasionally, access may be refused. If we refuse your access or correction request, we will provide you with a written notice setting out the reasons for our

refusal and how you can make a complaint to the Office of the Australian Information Commissioner (**OAIC**).

### **Complaints about a breach of your privacy**

51. If you are concerned about how we have collected or managed your personal information we request you contact the eviDent Privacy Officer, who will be the Chief Executive Officer, contactable on 03 8825 4600 or [ask@evident.net.au](mailto:ask@evident.net.au).
52. In order to effectively address your complaint, we may request further information from you about your complaint and the reasons behind the submission.
53. After we receive all the information we need from you, allow us approximately 28 days to address your complaint.
54. If you're not satisfied with how we have handled your complaint you can also contact the Office of the OAIC.

The OAIC is a government body independent of us. It has the power to investigate complaints about possible interference with your privacy. The OAIC can be contacted by telephone on 1300 363 992, by email ([enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)) or by using the contact details on the OAIC website ([www.oaic.gov.au](http://www.oaic.gov.au)).

### **Changes to this privacy policy**

55. We may amend this Privacy Policy from time to time to reflect eviDent's current data collection and disclosure practices, with or without notice to you. The most recent version of our Privacy Policy is available on the eviDent website. We recommend that you visit our website regularly to keep up to date with any changes to this Privacy Policy.