



# MUSCULOSKELETAL AUSTRALIA

## PRIVACY POLICY

Musculoskeletal Australia Limited ABN 26 811 336 442, (MSK, we and us) is committed to protecting your personal information and privacy. This Privacy Policy explains how MSK collects and handles personal information in the course of its business operations including through its website.

MSK is bound to comply with the Privacy Act 1988 (Cth) and the applicable Australian Privacy Principles under that Act in Australia. As a health service provider, MSK must also comply with the Victorian Health Records Act 2001 and the Health Information Privacy Code 1994 when it collects, holds, uses and discloses patient health information. By providing personal information to us, you consent to us collecting, holding, using and disclosing that personal information in accordance with and for the purposes specified in this Privacy Policy. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

You do not have to provide us with any personal information. However, if you do not do so, this may limit our ability to fulfil the applicable purposes for collection and the assistance and services we are able to provide you.

### What kinds of personal information do we collect?

The types of personal information that MSK collects will vary depending on the nature of your engagement with us – whether as a volunteer, consumer, employee, job candidate, website user, service provider, donor, partner or through your organisation's relationship with us.

By personal information, we mean information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

Sensitive information is a subcategory of personal information, which may include, but is not limited to, information or an opinion about, your political, religious or philosophical beliefs or affiliations, health information, sexual preferences or practices, or criminal record (**Sensitive Information**).

The types of personal information that we collect may include any or all of the following:

- your name, gender, date of birth, phone numbers, professional title, contact details (including email and postal address), ethnicity;
- your employment status, name of your employer and education background;
- your credit card and or bank account details;
- statistical information regarding your use of our websites, services and engagement on social media pages;
- health information and other information about your relationship to musculoskeletal conditions; and
- any other information you provide us that is relevant to one or more of MSK's functions or activities, in any form you may have submitted that information to us, or in other forms of interaction with you;

## **How we collect personal information**

MSK usually collects personal information directly from you in the following circumstances:

- when you contact, communicate with and give us feedback directly (by phone, in person, and by email);
- when you submit online enquiries;
- when you provide information via public social media pages;
- when you complete one of our consumer surveys in either paper or web-based format; or
- otherwise in the course of your dealings with us.

MSK may also collect personal information about you indirectly from third parties where it is unreasonable or impracticable to collect it from you directly, including from our business partners, our affiliates and related bodies corporate, publically available sources, or your authorised representatives.

### **Sensitive Information**

MSK will only collect Sensitive Information about you that is necessary for one or more of MSK's functions or activities, or where we are required or authorised by law to do so. By providing Sensitive Information to us, you consent to us collecting, holding, using and disclosing the information you provide in accordance with the terms of this Privacy Policy. We will seek your explicit consent to the collection of any Sensitive Information from you on or before each new collection, to the extent it is reasonably practicable for us to do so.

## **For what purposes do we collect your personal information?**

We collect your personal information for the following purposes:

- enabling you to access and use our services and website;
- organising fundraising and events;
- providing and managing consumer care;
- coordinating with other healthcare providers;
- operating, protecting, improving and optimising our business services;
- processing donations, sponsorships, volunteer reimbursements, and issuing receipts and donation statements;
- sending service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- sending marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- seeking continued support from donors and sponsors;
- responding to questions and obtaining feedback, including via researching donor attitudes and consumer satisfaction surveys;
- considering your employee or volunteer application;
- complying with our legal obligations and processes, resolving disputes and enforcing agreements with third parties; and
- internal reporting.

## To whom do we disclose your personal information?

We may disclose personal information for the purposes described in this privacy policy to:

- our volunteers, employees and ambassadors;
- third party suppliers, service providers and distributors;
- professional advisers such as accountants, solicitors, business advisers and consultants;
- payment systems operators (e.g. merchants receiving card payments);
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us;
- other persons, including government agencies, regulatory bodies and law enforcement agencies, pursuant to a lawful process or as required or authorised by law.

### Disclosure to overseas recipients

**[Example]:** Although most recipients are located in Australia, MSK may disclose personal information to other MSK group companies or to other third parties outside of Australia for the purposes set out in this Privacy Policy. Depending on the type of engagement you have with us, personal information may be transferred to ***[insert third parties and countries where such information may be transferred]***.

Some of the countries to which information is transferred may not have laws regulating the collection and disclosure of personal information. In these circumstances, MSK will take steps to ensure that the recipients of the personal information comply with the Privacy Act.

## How we store and protect your personal information

We take reasonable steps to protect your personal information from misuse, interference or loss and from unauthorised access, modification or disclosure.

We may hold your personal information in either electronic or hard copy (paper) form. We retain your personal information in our computer systems and databases, and in our physical files.

MSK uses technologies and processes such as access control procedures, network firewalls, encryption, password protected databases and physical security measures to protect your personal information. However, the confidentiality of any communication by email cannot be guaranteed and we are not responsible for the security of information transmitted by internet.

MSK takes reasonable steps to destroy or permanently de-identify personal information when we no longer need it for the purposes identified in this Privacy Policy or as required by law.

## Direct marketing

We may send you direct marketing communications and information about our services or about our partners. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Privacy Act and the Spam Act 2003 (Cth). You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (e.g. an unsubscribe link). We use MailChimp to provide our electronic newsletters, MailChimp is based in the USA. Your information (including IP address) will be transmitted to and stored by MailChimp servers located outside Australia. This means that Australian Privacy Principles and legislation do not apply. You can refer to Mail Chimp's Privacy Policy <https://mailchimp.com/legal/privacy/> and Terms of Use <https://mailchimp.com/legal/terms/> for further information to users located in Australia.

## **Links to other websites**

The MSK website may contain links to other sites. Other sites may also have links to the MSK website. In either case, MSK is not responsible for the content, privacy practices or business practices of any website or company except its own.

## **Cookies and web beacons**

We may also use 'cookies' or other similar tracking technologies on our website and social media sites that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our website may not work as intended for you if you do so.

Whilst we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit, search engine referrals and the internet protocol address assigned to your computer.

Our web pages may contain electronic images, known as web beacons. These electronic images enable us to count users who have visited certain pages on our website. Web beacons are not used by us to access your personal information, they are simply a tool we use to analyse which web pages are viewed, in an aggregate number.

## **Access to and correction of your personal information**

MSK will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date. You have the responsibility to ensure that changes in your personal circumstances are notified to us.

You may request access to, and correction of, your personal information. At your request, MSK will provide you with a copy of any personal information which we hold about you, unless an exception under the Privacy Act or other applicable legislation applies which means we are not required or permitted to provide you with that information. If we refuse to give you access to all or part of the information you have requested or to make the corrections you have requested, we will write to you and explain why.

We may first need to verify your identity before giving access or correcting your information.

MSK may charge you its reasonable costs associated with providing you with access to your personal information.

## Questions and complaints - How to contact us

If you have questions about how MSK handles your personal information, or if you wish to make a complaint about MSK's information handling practices, you can contact the Privacy Officer (details below).

In particular, if you wish to make a complaint about how MSK has handled your personal information, you should put your complaint in writing to our Privacy Officer.

MSK will acknowledge receipt of your complaint, verify your identity and will investigate and respond within 14 days of receiving a complaint from you. If you are not satisfied with the decision, you can contact us to discuss your concerns. If the complaint is unresolved, you can contact the Office of the Australian Information Commissioner to make a complaint. Contact details are as follows:

The Privacy Officer

Musculoskeletal Australia Limited

263-265 Kooyong Road

Elsternwick

VICTORIA 3185

03 8531 8000

[info@msk.org.au](mailto:info@msk.org.au)

Office of the Australian Information Commissioner

GPO Box 5218

Sydney

NSW 2001

1300 363 992

[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)