



## **PRIVACY POLICY**

### **INTRODUCTION**

The Reflexology Association of Australia (RAoA) handles information in accordance with the Privacy Principles set out in the Australian *Privacy Act 1998 (Cth)*. This policy provides information on our collection, storage and use of personal information.

### **COLLECTION**

The RAoA collects information from individuals when it is necessary for the performance of a business or organisation function. "Personal information" relates to information or an opinion about an identified individual (whether true or not and whether in recorded form or not).

The collection of personal information depends on the individual's relationship with the RAoA and intended business. Collection of personal information from individuals and its members occurs in a variety of ways including the completion of RAoA forms, when you contact us by telephone, fax, email or completing a Contact Us form, when you visit our website or Social Media pages, when you attend an RAoA organized event, through surveys or visit our offices in person.

Personal information the RAoA may collect (but is not limited to) includes the following:

- Name, postal and email address;
- Business details such as Australian Business Number;
- Telephone numbers (landline and mobile);
- Gender;
- Occupation, Reflexology training and qualification details;
- Clinic details including address, contact numbers and Insurance policy information;
- Health information including dietary requirements and details of impairments or disabilities; Formal complaints;
- Criminal history; and
- Details of any proceedings (including disciplinary proceedings) with any other professional Association.

The RAoA 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, in undertaking our audit, complaint resolution and investigation functions). However, the RAoA 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.



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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 on every occasion.

### **INFORMATION COLLECTED VIA OUR WEBSITE**

The RAoA will not collect any personal information from visitors to the website except in the instance it is knowingly provided in online forms or submitted through the contact RAoA option.

The RAoA website does track data that will not be used to identify you and may include:

- The number of visitors browsing the website and the number of pages viewed;
- The date, time and duration of the visit;
- The computer IP address;
- The path taken when browsing through the website; and
- Any information or forms downloaded.

The RAoA or our website hosting company may refer to this data to analyze trends and improve performance of the site

The RAoA website uses cookies. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on a users' computer. The information generated may be used to report how visitors use and browse our website. This information does not track or collect any personal information nor are we able to identify an individual by this data.

Sensitive information will only be collected if the individual gives consent or if it is required by law. Sensitive information means information about an individual's racial or ethnic origin, political opinions, membership of a political, professional or trade association, philosophical beliefs or affiliations, membership of trade union, sexual preferences or practices, or criminal record.

### **USE**

We only use personal information for the purpose for which it was collected – to provide administration and membership services to members, to investigate complaints and conduct disciplinary investigations and proceedings, to conduct



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member audits, to act as 3<sup>rd</sup> party administrator and provide details to the private health funds and other stakeholders, and as otherwise needed for our functions and activities.

We are an Association established to encourage, promote, protect and facilitate self-regulation of all activities affecting bona fide reflexology therapists. We use information acquired from individuals and members to facilitate these objects and purposes including promoting activities, public education programs, research programs, professional contact with therapists and promulgation of standards and guidelines.

We may at times share information about members with other Associations in support of our mutual objectives

We have developed a Code of Self-Regulation implemented by us. In connection with and pursuant to the Code, we may use, disclose and publish information publicly in relation to therapists, including therapists who may be subject to disciplinary action or complaints under the Code.

Contact information held by us may also be used to inform individuals of special offers or additional services provided by us. The individual contacted will be provided with the option of not receiving further communication of this nature.

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

1. In accordance with this Privacy Policy or any agreement you enter into with us; or
2. It is required or authorized by law, including without limitation the Australian Privacy Principles under the Privacy Act 1988 (Cth).

Individuals may choose not to provide their personal information to the RAOA for the purposes as set out in this Privacy Policy which may result in the ability of the RAOA or its members from being able to provide the individual with information about or offer it's full range of services.



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### **DISCLOSURE**

We do not sell any of the personal information collected. We will only disclose personal information for the primary purpose for which it was collected or for any secondary purposes as included in this Policy.

We do engage third parties to perform certain business functions. Therefore, it is sometimes necessary to disclose your personal information to those suppliers and contractors. Where disclosure takes place, we seek to ensure that your personal information is handled in accordance with the Australian National Privacy Principles.

The RAOA 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.

In the course of investigating complaints against a member or conducting disciplinary investigations and proceedings, the RAOA may also share the member's personal information and relevant information about the complaint, investigation or proceeding (including its outcome) with other parties, including 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 RAOA 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 finalized and even if the individual has ceased to be a member of the Association.

We may disclose, or provide access to, your personal information to third parties in connection with the purposes described in this Privacy Policy. The RAOA 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 and/or third parties that provide products and services to us or through us.

#### 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.



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In particular, your personal information may be disclosed to third party service providers which may store your personal information in the Philippines, 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

### **SECURITY**

The RAOA endeavors to protect your personal information from un-authorized use, access, disclosure and alteration. Committee members are only provided with access to personal information that is relevant to their roles and responsibilities, and we seek to ensure that these people comply with appropriate policy on the handling of personal information.

IT protection systems and internal procedures are also utilized to protect the personal information within National Office and on the RAOA website.

The RAOA will hold your information until there is no longer a business or legal requirement to retain it. Destroying all records includes removal of electronic data from our systems and secure document destruction of printed information.

### **CORRECTION**

The RAOA seeks to maintain a high standard of accuracy of your personal information. You can update your personal information at any time by logging into the Members Only area of the RAOA website and updating your personal information there or by emailing [membership@reflexology.org.au](mailto:membership@reflexology.org.au) or by writing to us advising of the information.

### **ACCESS**

The RAOA website at [reflexology.org.au](http://reflexology.org.au) contains personal information regarding you as a member of RAOA. Whilst you are a financial member of the RAOA you have



## **Reflexology Association of Australia**

ABN 50 101 412 319 www.reflexology.org.au  
PO Box 135 Mitcham Shopping Centre SA 5062

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access to that membership information and can view and update or change the information to ensure its accuracy. The RAOA will conduct random audits of that information to ensure the information complies with the membership rules displayed on the website. You will be contacted regarding any membership information that does not comply with those rules, including your certification requirements for the level of membership or other required criteria. Any certification documents supplied by you may be checked for rule compliance and retained for future reference. You may contact the RAOA at any time to access the personal information we hold about you. We may require that you fill out a form to access this information. Access will be provided unless the request is unreasonable or the Australian National Privacy Principles permit us to decline that access. As permitted by law, a fee may be requested to cover the cost of access.

A request for access can be made by contacting the Association by completing a Contact Us form on line.

#### **COMPLAINTS AND CONCERNS**

If you have any concerns about our handling of your personal information, please contact the RAOA. We may ask that you put your request in writing and will seek to resolve your concern as promptly as possible.

#### **CHANGES TO THIS PRIVACY POLICY**

We may modify or amend this policy at any time provided the policy still complies with the Privacy Act. The latest version of our policy can be accessed by contacting the Reflexology Association of Australia.