

ACTA PRIVACY POLICY

PURPOSE AND SCOPE

The Australian Clinical Trials Alliance (ACTA) recognises the importance of your privacy.

This Privacy Policy establishes how ACTA protects personal information and explains:

- what personal information ACTA collects;
- when ACTA collects personal information;
- how ACTA uses/discloses and stores that information; and
- your entitlement to access personal information.

This Policy applies to all personal information collected, stored, used and disclosed by ACTA.

The manner of consent for the collection and use of personal information is detailed in this Policy.

DEFINITIONS

Term	Definition
ACTA	The Australian Clinical Trials Alliance Sciences Limited (ABN 60 168 693 972), an incorporated body limited by guarantee
Board	The Board of Directors of ACTA
Constitution	The Australian Clinical Trials Alliance's Constitution
Member	A member of ACTA, as defined by ACTA'S Constitution.
Personal information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.
Sensitive information	Includes (for example) information about a person's membership of a professional or trade association.

PROVISIONS

1. Collection of Personal Information by ACTA

- 1.1. ACTA will only collect personal information that you have voluntarily provided to us or consented to us collecting.
- 1.2. ACTA only collects personal information that is relevant to and reasonably necessary for ACTA to fulfil its purposes, functions, activities and objectives, including to serve and work with its members, employees and other individuals (collectively "you").
- 1.3. The type of information ACTA may collect includes, but is not limited to:
 - title, name, address, email address, facsimile, other contact details;
 - hospital, university, industry, clinical trials network, clinical trial coordinating centre and clinical registry affiliations;
 - the type of Membership and date of admission to and cessation of Membership;

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- the dates of payments or waivers by the Board of annual subscriptions;
- responses to surveys and polls;
- bank account details and credit card information.
- place and date of birth and Australian citizenship or residency status;
- awards, honours, qualifications, experience, training and work history;
- research grants and publications;
- biography and curriculum vitae;
- personal and professional reference reports;

1.4. The main points at which personal information may be collected by ACTA are when you:

1.4.1. visit ACTA website;

1.4.2. apply to join ACTA as an employee or Member, or member of the Board, Committee or Reference Group;

1.4.3. complete an online survey or poll;

1.4.4. support ACTA financially; and

1.4.5. when otherwise contacting or communicating with ACTA.

1.5. ACTA does not collect sensitive information without your consent.

1.6. Where ACTA collects information about you from a third party, for example referees and supervisors, we will take reasonable steps to ensure that you have consented or have been made aware of the details as set out above.

1.7. Similarly, ACTA may be required to provide your contact details to third-party suppliers of services that you would reasonably expect ACTA to do to provide its services. ACTA provides the opportunity to opt-out of such third-party arrangements.

1.8. When ACTA collects credit card or other payment details, we will not store them, or they will be masked or encrypted after your payment has been processed.

1.9. In addition to website traffic data, the only personal information ACTA collects from you via its website is that which you agree to provide, for example, when you complete an online form, poll or survey, or to register for an event.

2. Use and Disclosure of Personal Information by ACTA

2.1. Personal information will not be sold, exchanged, transferred or given to any other company for any reason whatsoever, without your consent, other than for the purpose of working with you, and providing programs and services to you.

2.2. In some instances, where ACTA has business relationships with third parties, ACTA may disclose your personal information to third parties that we have engaged to provide us with services on your behalf. These include surveys, training and education, event management, payment processing, payroll and the preparation of mailings. Wherever possible, these third parties have agreed to treat personal information they receive from us in a confidential manner.

2.3. In general terms, personal information held by ACTA may be used by ACTA or disclosed to third parties for one or more of the following purposes:

2.3.1. Assess applications for Membership. This may involve the disclosure of personal information to third parties connected with peer review;

2.3.2. Manage ACTA membership and maintain records;

2.3.3. Manage ACTA's meetings and events or those endorsed or supported by ACTA. This may involve the disclosure of personal information to third party organisers for the purpose of sending invitations and event registration;

2.3.4. Send notices and information to Members about ACTA events, nominations, and committees and otherwise communicate with you. This may involve the disclosure of personal information to third

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parties engaged by ACTA to assist with the sending of notices or information or to manage communications;

- 2.3.5. Confirm your Membership to members of the public;
 - 2.3.6. Report to government departments, regulators and the public on the general composition of the Membership;
 - 2.3.7. Provide information about members to academic or research institutions and publishers, that the Board considers to be appropriate bodies for ACTA to share information about members with;
 - 2.3.8. Monitor or investigate the conduct of Members under ACTA Constitution;
 - 2.3.9. Procure funding, donations or other support for the activities of ACTA;
 - 2.3.10. Provide the Membership with contact information of ACTA's Board and staff;
 - 2.3.11. Provide Committee members with contact details for all members of the same Committee;
 - 2.3.12. Conduct or facilitate research or surveys for purposes related to ACTA or its activities, including to evaluate the composition of the Membership and to understand the expectations and potential contributions of the Membership and Reference Group and Committee members to ACTA and its programs;
 - 2.3.13. Monitor website traffic data for statistical, reporting and maintenance purposes;
 - 2.3.14. Process applications for employment with ACTA; and
 - 2.3.15. Otherwise collect, use, or disclose personal information about you in a manner consistent with the purposes, objectives, and functions of ACTA
- 2.4. ACTA may also disclose personal information, both within and outside Australia as required or permitted by law. In Australia, this includes disclosure to the following persons in order to enable ACTA to comply with the law, enforce our policies, or protect our or others' rights, property or safety:
- 2.4.1. ACTA's professional advisors including lawyers, accountants, tax advisors and auditors;
 - 2.4.2. Law enforcement bodies to assist in their functions, courts of law or as otherwise required or authorised by law;
 - 2.4.3. Debt collection agencies and other parties that assist with debt-recovery functions; and
 - 2.4.4. Regulatory or government bodies for the purposes of resolving complaints or disputes both internally and externally or to comply with any investigation by one of these bodies.

3. Data Storage and Security

- 3.1 ACTA is committed to ensuring the security of personal information. ACTA is responsible for ensuring that personal information held by ACTA about you is protected by such security safeguards as it is reasonable in the circumstances to take against loss, unauthorised access, modification, disclosure or other misuse of your personal information.
- 3.2 Steps taken to protect your personal data include staff induction covering the use of Information Communications Technology (ICT), use of passwords to access accounts, segregation of folders with staff assigned to access information dependant on role and responsibilities, virus protection software and software to protect unsolicited malware.

4. Entitlement to Access and Correct Personal Information

- 4.1. You are entitled to request access to your personal information held by ACTA.
- 4.2. In normal circumstances ACTA will give you full access to your information.
- 4.3. However, there may be some legal or administrative reasons to deny access. If ACTA decides to deny access, ACTA will provide you with the reason why.

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- 4.4. You are entitled to request the correction of any personal information, and if there is a reasonable basis for declining the correction request, you are entitled to request that a statement of correction sought but not made be attached to the information.
- 4.5. If you would like to access your personal information or if you believe that your personal information may be inaccurate, out of date or incomplete, you can make a request for access or correction by sending an email to acta@clinicaltrialsalliance.org.au. We will respond to your request for access and/or correction within 20 working days after your request is made. We may charge reasonable costs for making information available to you.

5. Keeping information accurate and up to date

- 5.1. ACTA makes every reasonable effort to keep your information accurate, up to date and complete to provide the best possible service to you. You can assist by keeping ACTA informed of any updates such as address change, email change or legal name change. Please contact us as soon as practicably possible when your information changes by emailing us at acta@clinicaltrialsalliance.org.au.

6. Disclosure to recipients outside Australia

- 6.1. Information you provide to ACTA may be accessed by or held by third party agencies based outside of Australia for the purposes of managing ACTA's business operations.
- 6.2. ACTA takes reasonable steps in the circumstances, to ensure that the overseas recipient does not breach your privacy.
- 6.3. ACTA may seek contractual arrangements with the overseas recipients, whereby the recipients are also contractually obliged to meet the APPs and/or our privacy policy.
- 6.4. ACTA will not be held responsible for events arising from unauthorised access to your personal information.

7. Reporting a breach of your privacy

- 7.1. If you have any concerns that your privacy has been compromised or have any other privacy related complaint, please email acta@clinicaltrialsalliance.org.au and we will contact you within 10 business days to confirm receipt of your email. We will then investigate your complaint and provide you with our response within a reasonable time. If after receiving our response, you still consider that your privacy complaint remains unresolved, you may then, for example, take your complaint to the Office of the Australian Information Commissioner.

8. Changes to our Privacy Policy

- 8.1 ACTA is continually evolving and reserves the right to modify this Privacy Policy at any time.

9. Contacting ACTA

- 9.1 If you have any questions regarding ACTA's Privacy Policy or our handling of personal information, please contact us by email acta@clinicaltrialsalliance.org.au or by phone 03 8639 0770.