

PRIVACY POLICY

1 We respect your Privacy

NAPSA represents and advocates for students enrolled in undergraduate and postgraduate pharmacy courses at Affiliate Universities across Australia and aims to be the voice of Australian pharmacy students in the pharmaceutical industry.

NAPSA is committed to managing personal information in an open and transparent way in compliance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) (Privacy Act) and in accordance with other applicable privacy laws.

This Privacy Policy sets out how we handle your Personal Information, including the collection, storage, use and disclosure of your Personal Information, how you can access and correct the Personal Information that we hold about you, provide us with feedback and make a complaint.

When you contact us, visit our Website, complete a membership application form, questionnaire or other forms associated with NAPSA membership including a membership application with an Affiliate University that automatically entitles you to NAPSA membership, or participate in sessions provided by us, you agree to the handling of your Personal Information in accordance with this Privacy Policy.

In this Privacy Policy:

- **“Affiliate University”** means a University offering undergraduate and postgraduate pharmacy courses in Australia;
- **“NAPSA”, “we” and “us”** refers to the National Australian Pharmacy Students Association (ABN 63 261 503 316);
- **“Personal Information”** has the meaning that it is given under the Privacy Act 1988 (Cth), namely, information or an opinion, whether true or not, and whether recorded in material form or not, about an individual whose identity is apparent or can be reasonably ascertained from the information or opinion;
- **“Sponsors”** means entities that Sponsor the services provided by NAPSA as updated from time to time. A complete list of the current Sponsors of NAPSA is available on the Website.
- **“you” and “your”** refers to any member or individual who shares Personal Information with us by any means or for any reason.
- **“Website”** refers to the NAPSA website at www.napsa.org.au.

2 The types of Personal Information we collect

When you become a member of NAPSA directly, become a member of an Affiliate University which automatically entitles you to membership of NAPSA, or otherwise engage with us, a record is made which includes your Personal Information.

The amount and type of Personal Information that we collect from you will vary depending on the circumstances of collection (including your Personal Information the Affiliate University provides to us in relationship with your membership) and the kind of service that you request from us, but will typically include:

- your name;
- your address, phone number and email address;

- your date of birth and gender;
- the name of Affiliate University and course that you are enrolled in;
- your student number with the Affiliate University;
- your intended graduating year;
- your IP address and location information if accessing our Website from a mobile device; and
- any additional Personal Information you provide to us, or authorise us to collect, as part of your interactions with us.

3 How do we collect your Personal Information

We will collect your Personal Information in a number of ways, including:

- in forms that you complete and submit to us or an Affiliate University;
- when you subscribe to any newsletters or updates provided by us or submit an enquiry on our Website;
- in correspondence with you (whether in writing or electronically via telephone or using video conferencing technology);
- when you register interest in attending courses with us including during any sessions that we hold or promote;
- when conducting market research surveys; and
- when conducting promotions.

We will only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act.

1.1 Request for anonymity and refusal to provide Personal Information

You can always decline to provide any Personal Information we request or to remain anonymous or use a pseudonym in your interactions with us. However, that may mean we cannot provide you with some or all of the services or information you have requested or services associated with membership of NAPSA. If you have any concerns about Personal Information requested by us, please let us know. Our contact details are provided in section 7 below.

You may visit our Website without identifying yourself. If you do identify yourself (for example, by providing your Personal Information in subscribing to our newsletter or submitting an enquiry), any Personal Information you provide will be managed in accordance with this Privacy Policy.

1.2 Online data collection and use

Our Website uses cookies. 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. We may use cookies from time to time to collect non-personal information such as:

- your device type;
- your browser type;
- your IP address;
- your operating system;
- pages you have accessed on our Website and on third-party websites immediately before and after visiting our Website;

- peak usage times; and
- other information that helps us make our Website easier and more efficient for you to use.

You are not identifiable from such information. This information is used for Website analysis, administration, statistical and maintenance purposes. You can adjust 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 or content on our Website.

1.3 Third Party Websites

Our Website may contain links to third-party websites not owned or controlled by us, including for example website of Affiliate Universities and Sponsors. These links are provided for your convenience only. NAPSA is not responsible for the content or privacy practices of any such websites that are linked to our Website. We encourage you to read and familiarise yourself with the privacy policies of every website you visit.

NAPSA 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.

2 Use and disclosure of your Personal Information

We treat your Personal Information as strictly private and confidential.

2.1 How do we use your Personal Information?

The purposes for which NAPSA collects and uses your Personal Information depends on the nature of your interaction with us and the services we are providing to you, but may include:

- responding to your requests for information, general enquiries and complaints;
- contacting you and maintaining records of your interactions with us;
- administrative purposes associated with providing membership services;
- providing you with updates with respect to NAPSA and the pharmacy industry;
- send you our newsletter “ePlacebo”;
- distribute the National Pharmacy Students’ Survey;
- distribute to you third party promotional, sponsorship content that is deemed by NAPSA to be of member benefit;
- to verify transactions you make and for billing, security and authentication purposes;
- create an alumni register; and
- informing you about new and additional service offerings available.

2.2 Who do we disclose your Personal Information to?

Access to your Personal Information will be restricted to those persons at NAPSA and each of the Sponsors (where applicable) that require access in order to deliver our services to you and who have been properly authorised.

NAPSA may also be required to disclose your Personal Information to third parties. You agree that we may share your Personal Information:

- with Affiliate Universities for the purpose of validating your enrolment in an eligible pharmacy course;

- with Sponsors in order to allow the Sponsors to market to you directly. Information from our Sponsors includes advice about events and resources that the Sponsor offers to the pharmacy profession and believes is of interest to you;
- with any third party contractors and service providers we use for data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance/development, printing and archiving;
- with our professional advisors; and
- where required by law.

In the event that a third party other than a Sponsor wishes to contact members this is facilitated by NAPSA or with your express, informed consent.

We may also disclose your Personal Information to third parties for research purposes. With the exception of the disclosure to the Sponsors in identified format as detailed above, this will always be in an aggregated and de-identified format.

2.3 Does NAPSA disclose your Personal Information overseas?

We do not disclose or store your Personal Information overseas.

If you choose to provide NAPSA with personal information, you are consenting to the collection, use and disclosure of that information and to the transfer of that information to our servers in Australia.

If our data handling practices change and your Personal Information is intended to be sent outside of Australia, we will require your consent before doing so and will only disclose your Personal Information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your Personal Information. We will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

2.4 Does NAPSA use or disclose your Personal Information for direct marketing?

NAPSA may use or disclose your personal information to Sponsors for the purpose of informing you about services offered by NAPSA and/or the Sponsor and relating to your membership and the profession of pharmacy, including upcoming promotions 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 'unsubscribe function' on any email sent to you by NAPSA or using the contact details provided in section 7 below. If you opt-out of receiving marketing material from us, NAPSA may still contact you in relation to its ongoing relationship with you.

If you unsubscribe from receiving marketing material from us, you will not be automatically unsubscribed from marketing material from the Sponsors. Similarly, if you unsubscribe from receiving marketing material from one Sponsor, you will not be automatically unsubscribed from receiving those materials from another Sponsor or from us. Accordingly, if you wish to unsubscribe from marketing material you will need to do so for the particular organisation that you received the marketing material from or alternatively by contacting us using the contact details in section 7 below and we can assist to facilitate this request with each Sponsor to which your Personal Information has been shared.

Other than as set out above with respect to Sponsors, we will not disclose your Personal Information to third parties for marketing purposes without your consent.

3 Security and storage of your Personal Information

We take reasonable steps to ensure that your Personal Information is stored securely and is protected from misuse and loss and from unauthorised access, modification or disclosure. This includes by maintaining:

- physical security over any paper-based and electronic data, such as through locks and security systems at our premises and secure databases (including trusted third-party storage providers located in Australia); and
- computer and network security, for example, we use firewalls, password protected secure system access and data encryption.

Our Website is hosted in Australia. If you access the Website from outside Australia, you are voluntarily transferring content (potentially including personally identifiable information) to Australia and agreeing that NAPSA's collection, use, storage and sharing of that content is exclusively subject to the laws of Australia rather than the laws of the country in which you are located.

If you choose to provide NAPSA with Personal Information, you are consenting to the collection, use and disclosure of that information and to the transfer of that information to our servers in Australia.

Transmission and exchange of Personal Information with us is at your own risk. We cannot guarantee the security of any information that you transmit to us or receive from us.

We will retain your Personal Information for as long as it is required to provide you with our services and to comply with legal requirements. If we no longer require your Personal Information for any purpose, including legal purposes, we will take reasonable steps to securely destroy or permanently de-identify your Personal Information.

4 How can you access or seek correction of your Personal Information?

4.1 Your right to access your Personal Information

You are entitled to request access to, and correction of, your personal information that we hold about you at any time. To do so, please contact us using the contact details set out in section 7 below.

In some cases, deletion of Personal Information may result in termination of your membership. This is managed on a case-by-case basis and you will be informed if this is the case.

We will always endeavour to meet your request for access within a reasonable time and in the manner requested by you, if it is reasonable to do so. However, in some circumstances we may decline a request for access or correction of your Personal Information. We will give you written reasons for our decision when we respond to your request. If you have any concerns about the refusal, please see section 7 below.

We reserve the right to charge you an administrative fee for access to some types of Personal Information that we hold about you, including for example the preparation and copying of files and records. These charges will be limited to the cost of recouping our expenses for providing you with the requested information.

4.2 Correcting your Personal Information

We will take reasonable steps to ensure that the Personal Information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice

errors or discrepancies in information we hold about you and letting us know if your personal details change. We will respond to your request within a reasonable period and take reasonable steps to amend our records. In the event that we disagree with the changes you have requested to your Personal Information, we will give you written reasons for our decision and notate on your records that you disagree with our decision.

5 **How to Contact us**

You may contact NAPSA at any time if you have any questions or concerns about this Privacy Policy, or about the way in which your Personal Information is handled. Please direct all correspondence to:

Contact : NAPSA Secretary

Mail: PO Box 6154, Alexandria, NSW, 2015

Email: secretary@napsa.org.au

We take all complaints seriously. We endeavour to investigate and respond to any complaint within 30 days of receipt. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our handling of your complaint, you may contact the Office of the Australian Information Commissioner (**OAIC**). The OAIC can be contacted by telephone on 1300 363 992, by email enquiries@oaic.gov.au or by using the contact details on the OAIC website.

6 **How are changes made to this Privacy Policy?**

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

This Privacy Policy was last updated in June 2023.