



HL7 AUSTRALIA - PRIVACY POLICY

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About this policy

HL7 Australia Ltd, ABN 37 629 010 297, ("**HL7 Australia**", "**we**", "**us**" or "**our**") is committed to best practice in the protection of personal information and are bound by the *Privacy Act 1988* (Cth) ("**Privacy Act**"). This Privacy Policy outlines our policies in relation to management of personal information as required by the Privacy Act.

Our specific legal obligations when collecting and handling your personal information are outlined in the Privacy Act and in particular in the Australian Privacy Principles ("**APPs**") found in that Act. We will update this privacy policy when our information handling practices change. Updates will be published on our website.

When sending commercial electronic messages, we also comply with the *Spam Act 2003* (Cth).

Purposes for which personal information is collected

We collect, hold, use and disclose personal information to carry out functions or activities that include:

- (a) governance and administration of HL7 Australia in accordance with the *Corporations Act 2001* (Cth), the *Constitution of HL7 Australia* ("**Constitution**"), and the *HL7 Australia By-Laws*, including without limitation:
 - (i) maintaining a register of HL7 Australia members that includes details of individual members and of persons nominated by organisation members as their representatives or other participants in HL7 Australia professional activities;
 - (ii) managing contracts, service agreements and any employee records, and
 - (iii) processing and accounting for financial transactions,
- (b) offering and providing services, entitlements and information to HL7 Australia members and to participants nominated by organisation members;
- (c) conducting professional activities that include (but are not limited to):
 - (i) conducting HL7 Australia working groups to develop Australian HL7 implementation guides (and/or other documents);
 - (ii) public balloting for acceptance of proposed Australian HL7 implementation guides (and/or other documents) and the receipt of comments in relation to such ballots;
 - (iii) reconciling, following-up and providing feedback on comments arising from such balloting; and

- (iv) promoting, conducting, evaluating and improving HL7 Australia training courses, seminars, conferences, connectathons, webinars and working group meetings,
- (d) fulfilling our commitments under the affiliate agreement with HL7 International Inc (“**HL7 International**”, a corporation based in Ann Arbor, Michigan, USA), including providing HL7 International with sufficient information on HL7 Australia members and their participants to enable members of HL7 Australia to exercise their rights under the affiliate agreement (such as: receiving reduced “member” rates at HL7 International events; and voting in some HL7 International ballots);
- (e) promoting, providing, evaluating and improving a range of HL7®/FHIR®¹ training courses under contract to the Australian Digital Health Agency (“**ADHA**”) including providing reports to ADHA on participation in such courses;
- (f) communicating with the public, stakeholders and the media including through websites and social media;
- (g) analysing your interaction with our personal and electronic services in order to improve our services to you and to optimise the information and services that we offer or provide to you;
- (h) using information and/or providing information to third parties as authorised or required by law;
- (i) assessing proposals and evaluating candidates seeking to provide services to us (as contractors or employees); and
- (j) any other function or activity for which consent has been sought from and given by you.

Collection of your personal information

We try to only collect the information we need for the particular function or activity we are carrying out.

We collect personal information about you such as your name and contact details when:

- (a) you apply for individual membership of HL7 Australia;
- (b) an organisation member nominates you as their “Representative” or as one of their other “Participants” (as defined in our Constitution);
- (c) you apply to register for, participate in, lead or provide support for an HL7 Australia function or activity;
- (d) you sign up (either directly or by implication) to one of our mailing lists;
- (e) you submit a query via the *Contact Us* form on the HL7 Australia website;
- (f) you stand for election as a director (or appointment as an officer) of HL7 Australia;
- (g) you provide information in support of a proposal to supply us with services or an application for employment with us;

¹ HL7® and FHIR® are registered trademarks of Health Level Seven International. The use of these trademarks does not constitute endorsement by HL7 International.

- (h) your details as held by us are updated by you or, on your behalf, by us or by a member that has nominated you as a participant;

We collect personal information when provided by you in person or via:

- (a) the HL7 Australia website: www.HL7.com.au, which is maintained using WordPress on a server hosted in Australia;
- (b) websites hosted by organisations delivering services under contracts with us that include requirements protecting the privacy of personal information; and
- (c) email, telephone, facsimile and postal communication.

We may use web analytics to collect data about your interaction with our website. The main purpose of collecting your data in this way is to improve your experience when using our site. We also use this data to understand and report on which content pages and downloads are accessed by visitors. The types of data that may be collected for this purpose includes:

- your device's IP address
- pages visited on our website and time spent on the page;
- date and time when pages were accessed;
- device type, operating system and browser information; and
- your geographic location (city).

We may also collect personal information from publicly available sources to enable us to contact stakeholders who may be interested in our work or in participating in our activities.

We may use social networking services such as LinkedIn, Twitter, Facebook and YouTube to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for LinkedIn, Twitter, Facebook and Google (provider of YouTube) on their websites.

We have contracted the University of Melbourne to service our HL7/FHIR training courses. If you are participating in one or more of these courses you will need to provide personal information as part of the enrolment process and to support your use of the learning environment provided by the University of Melbourne, this information will also be shared with us. The University's privacy policy may be found [here](#).

Some of the HL7/FHIR training courses require use of technical infrastructure and resources provided by CSIRO and its subcontractors under a contract with us that protects the privacy of any personal information you provide to them. The provision of any personal information to CSIRO and its subcontractors is also covered by the [CSIRO Privacy Policy](#).

Use and disclosure of personal information

General

We do not use your personal information or disclose it to another organisation unless:

- it is reasonably necessary for one of the purposes described above;

- having regard to the nature of the information or the circumstances of collection we believe you would expect us to use the information or make the disclosure;
- it is necessary to obtain third party services (such as educational support, event management or information processing services);
- required or authorised by law or court or tribunal;
- it is necessary to protect the rights or property of a member, the public or our interests, and it is unreasonable or impracticable to obtain your consent;
- the assets and operations of our business are transferred to another party as a going concern;
- it is for one of the purposes expressly permitted under the Privacy Act; or
- you have provided your consent.

Third-party service providers

To protect any personal information collected or held by third-party service providers on our behalf, or disclosed by us to them, we:

- generally, enter into a contract which requires the service provider to only use or disclose the information for the purposes of the contract;
- include special privacy requirements in the contract, where necessary.

Disclosure of personal information overseas

Generally, we only disclose personal information overseas for the following reasons:

- To advise HL7 International of the identify of our members and of participants nominated by our members, so that those members and participants may be given the same access to HL7 International websites and privileges as members of HL7 International (including discounted attendance at HL7 International events). HL7 International and its information systems are located in the United States.

A member of HL7 Australia accessing HL7 International websites may need to register separately on those websites and any personal information provided as part of that registration process is covered by the rules and regulations of HL7 International under domestic US law and is not covered by this privacy policy.

HL7 Australia may from time to time disclose information to HL7 International about a former member of HL7 Australia that is no longer a member of HL7 Australia so that HL7 International may, where applicable, discontinue the former member's access to HL7 International websites and member privileges, where such access is conditional on being a current member of HL7 Australia.

- As part of a communication with an HL7 Australia member or office bearer that is overseas at the time.

Web traffic information may be disclosed to Google Analytics when you visit our websites. Google stores information across multiple countries.

When you communicate with us through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold your personal information overseas.

Quality of personal information

We aim to ensure that personal information we collect, hold or disclose is accurate, up-to-date and complete through measures that include:

- where necessary, seeking to confirm the accuracy of personal information through independent checks;
- promptly adding or amending personal information; and
- periodically checking our member details and contact lists for accuracy.

We also consider the quality of personal information before we use or disclose it.

Storage and security of personal information

All personal information collected by or on behalf of HL7 Australia is held on servers located in Australia. We retain effective control over any personal information held by us or on our behalf to ensure that it is handled in accordance with the APPs.

We take reasonable precautions to protect the security of personal information that we hold from internal and external threats:

- by considering the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information – and, where practicable, implementing measures to address those risks; and
- by ensuring that the reasons for holding instances of personal information are periodically reviewed and that any personal information that is no longer reasonably required is destroyed and/or deleted.

You can assist us in keeping your personal information secure by maintaining the confidentiality of your account passwords and notifying us immediately if there is any unauthorised use of one of your accounts by another Internet user or any other breach of security relating to any of your accounts.

Accessing and correcting your personal information

Under the Privacy Act ([APP 12](#)) you have the right to request access to personal information that we hold about you.

Under [APP 13](#) you also have the right to request that we correct any information that we hold about you.

To request access to or correction of the personal information that we hold about you please send an email to privacy@hl7.com.au, clearly indicating the nature of your request, the information affected (where known) and, in the case of a correction, any further information clarifying the request.

We shall endeavour to respond to any such request as promptly as possible but, in any case, within 30 days of acknowledging receipt of your request.

If your original request is not acknowledged promptly, you should follow up with the HL7 Australia Company Secretary (as advised under the HL7 Australia Board on the HL7 Australia website) to confirm that your request has been received and is being addressed.

Where you request access to your personal information, except where the law provides otherwise, we must give you access to the information, and in the manner that you request, provided that it is reasonable and practical for us to do so.

Where you request that we correct your personal information we must take such steps (if any) that are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

We may ask you to verify your identity before we give you access to your information or correct it.

If we refuse to give you access to, or to correct, your personal information, we must notify you in writing setting out the reasons for our refusal (except to the extent that it would be unreasonable to do so) and what you may do if you are not satisfied with our reply.

If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We must do so unless there is a valid reason not to.

If we refuse to correct your personal information, you can ask us to associate with the information (e.g. by means of a link or attachment) a statement that you believe the information is incorrect and why.

Further information and complaints

If you require any further information about our management of personal information or have a complaint about our handling of your personal information, you should advise us by email to privacy@hl7.com.au and we will respond to you within a reasonable time, usually 30 days.

If you are not satisfied with the outcome of your complaint you may contact us further to advise of your concerns and, if we are unable to reach a satisfactory resolution you may write to the Office of the Australian Information Commissioner using the form available [here](#) for further review of your complaint.