

Medicines Australia – Privacy Policy

Overview

This privacy policy outlines the personal information handling practices of Medicines Australia. It describes how we protect the privacy of the personal information we hold about you including to meet the requirements of the Privacy Act 1988 which requires us to have this policy and to make it available.

Medicines Australia represents the prescription medicines industry. Its mission is, in partnership with key stakeholders, to drive the creation and development of a predictable environment for the continued sustainable growth of innovative research based prescription medicines industry so Australians continue to lead longer and healthier lives.

We collect, hold, use and disclose personal information to carry out our mission and related functions or activities which include:

- Administering the Medicines Australia’s Code of Conduct for advertising and promotion of prescription medicines – including complaints about breach of the code of conduct including the transparency provisions
- Following the activities of members of Parliament and government departments and promoting policy options to ensure the continuation of a viable medicines industry
- Engaging with key consumer groups to better understand their needs and issues
- Liaising with health professional organisations to keep up to date with developments in healthcare and to discuss issues of mutual concern
- Administering Medicines Australia’s Continuing Education Program which is a compulsory education program for all medical representatives employed in the industry
- Providing briefings and publications to educate the community about the industry in Australia
- Providing services for member companies including:
 - Briefings on policy initiatives and issues
 - Representations to government on behalf of industry
 - Representing the industry at relevant health, medical and research activities
 - Providing specialist advice to member companies
- Contributing experience and expertise through activities such as membership of advisory committees and participation in health and industry policy.

Collection

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

We may collect and hold information about special requirements for attendees at our events, but we do not otherwise collect or hold sensitive information such as health information about our

member representatives, non-members or stakeholders. We destroy this information after two years.

Member representatives

We collect and store in our contacts database, contact details and chosen topic areas of interest about member representatives; member representatives provide this information by filling out a paper form. The information enables us to provide member services (for example, news, updates, memos or briefings) check entitlement to access the member website and meet regulatory requirements such as ASIC reporting, corporations law and constitutional requirements. We also store information about a member's participation in Medicines Australia's working committees and any contact preferences expressed on the form.

Non-members and stakeholders

We collect and store information about non-members including non-member committee or working group members and contacts from potential member companies and other stakeholder organisations or individuals that we have regular contact with. Stakeholders include personnel from health care consumer and professional groups, academics, advocacy groups, government departments and parliamentarians. We collect information about non-members and stakeholders by direct means, for example, through meetings and business cards, and indirectly through personal recommendations or publicly available sources. We keep a record of how a person is added to our contact database. We sometimes keep notes of our interactions with non-member and stakeholder representatives.

We collect and use information about non-members and stakeholders to develop a relationship with the company or organisation, including by sending a letter or email inviting the representative to an event such as a parliamentary dinner.

Board members

We store encrypted contact details of board members in a secure portal that is only accessible to other board members, the company secretary and the Chief Executive Officer. The information is name, email address, mobile number, personal assistant name and mobile number.

Committee members

We keep details of payments made to Medicines Australia committee members including bank account details.

Attendees at continuing education programs and other events

We collect and store information about people who attend continuing education programs that Medicines Australia administers. The academic institution (usually a University) that runs the education on Medicines Australia's behalf sends us the following information:

- name of program attendee
- university at which course completed
- student number
- date of birth
- year of participation and completion

- company at the time of completing course
- full results
- full address
- email address
- academic period.

We keep this information to enable the individual to get a copy of their results or an employer coordinator or potential employer from the pharmaceutical industry to check (with consent) that an individual has completed the course and on their results. We also use the information to choose winners for the Continuing Education Program Achievement Awards.

We also collect limited registration information from attendees of other Medicines Australia training or other events, for example, code of practice training, and from third party providers of registration services for Medicines Australia conferences. This may include an attendee's access, dietary or other special requirements.

We often take photographs at events Medicine's Australia has organised. We use them for promotional purposes, for example, on brochures, our Annual Report, or the Medicines Australia website. Attendees who do not wish photographs about them to be used in this way should contact us.

Code of Conduct Complaints

Medicines Australia through its Code of Conduct Secretariat collects contact information from non-industry complainants in the course of handling code of conduct complaints. We also collect other information from the complainant where necessary to investigate and make a decision about the complaints. To protect the integrity of the process the Secretariat will not accept anonymous complaints. Non-industry complainants can request that the information they provide is not revealed to anyone else (for example, the code complaints committee or the company complained about). As a matter of policy, the Code Secretariat withholds a non-industry complainant's name from the company against whom the complaint is made. Medicines Australia does not publish the name of a non-industry complainant in any reports on the outcomes of code complaints.

Other activities

We also collect and hold information about:

- service providers to Medicines Australia such as lawyers and trades people
- Medicines Australia employees including financial information which is not linked to the contacts database and kept separate from other Medicines Australia data.

Use

We only use the personal information we hold for the purposes for which we have collected it or for a related purpose that the individual would reasonably expect. For example, Medicine's Australia Board members may contact a member's Managing Director to gain member views on policy issues for input to Board meetings or to brief them on the outcome of a Board meeting.

We will gain a member representative's consent to use information about them for a purpose we think they would not reasonably expect.

Disclosure

We do not disclose personal information to a third party unless we have the individual's consent, the individual would reasonably expect it or we are required or authorised by the law to disclose it.

Disclosure to other member representatives

In some circumstances we disclose member representative contact details to other members. For example, to facilitate interactions between members on issues that Medicine's Australia has an active interest or involvement in, such as industry task forces.

Legal authorisation or requirement to disclose

As authorised by the Privacy Act we disclose personal information in connection with law enforcement activities by enforcement bodies.

Information we publish

We publish the following information in our annual report or website about member representatives and other individuals in the following circumstances:

- the names of Continuing Education Program award winners
- the names of members of Medicines Australia working groups, issues groups, committees such as the Code Complaints, Appeals and Monitoring Committees
- the names of Medicines Australia board and executive members and other senior staff
- health journalism award winners
- member representative Pat Cleary award winners
- a video of a members meeting, but only published in the secured members area.

Brief biographies for all Code, Appeals and Monitoring Committee members are available on the Medicines Australia website.

Continuing education program results

We disclose information about the continuing education program results of an individual to a member coordinator or a potential member employer, but only with proof that individual has agreed to the disclosure and the individual has provided adequate information to enable us to establish that the results record relates to them.

Government agencies, for example, ACCC

From time to time we give member contact names to government agencies that request them. We only do so if the request is directly related to Medicines Australia's functions or activities and that members would reasonably expect such a disclosure. For example, we may give member contact details to the ACCC to enable them to consult members about a draft code of practice that Medicines Australia has submitted for approval. We also give the ACCC submissions, comments or workshop outcomes from individuals and stakeholders about draft codes of practice.

Third party service providers

We may disclose information about member representatives to our third party service providers. For example, we may confirm to a service provider assisting us with registration for a conference whether or not a person registering is from a member company.

Overseas disclosure

Medicines Australia does not disclose personal information to overseas recipients. All the personal information we hold is stored on our own servers, on site, in Australia. We would only disclose personal information to an overseas recipient if we have the individual's explicit consent.

Website

Medicines Australia administers a number of websites including its public website www.medicinesaustralia.com.au. We have other secure websites which are for members only, or for committees or working groups.

We collect username, password and email address during account registration for access to the member's section of our website <https://members.medaus.com.au>. Member representatives can change their password or email address through the members' section of our website.

We use PIWIK analytics to collect and analyse information about your interactions with our websites. PIWIK analytics uses a range of techniques to collect this information including cookies. For our public website we collect IP address, domain name (if available), references to the web address you linked to our site from, system information such as your operating system/platform, the type of web browser you use, the pages you visit and the time spent on each page. For all our websites, for example, our member's website, we can link this information to the member representative's username.

Internal Medicines Australia staff only use this information for website and system administration, including monitoring to prevent security breaches, customisation of the website to the user's need and evaluation, research and development.

We do not disclose any of this information to third parties for any purpose unless we are authorised or required by law to do so, for example, for the investigation of a criminal offence, or to comply with a search warrant or subpoena.

Storage and security of personal information

We regularly assess the risks of misuse, interference, loss, unauthorised access, modification or disclosure of personal information and ensure that we have adequate measures, including policies, procedures and technology, to address those risks. For example, we limit staff access to personal information to that which they need to carry out their role. We conduct regular internal and external audits to assess whether we have adequately complied with or implemented these measures.

Retention of information

We hold information about member representatives, stakeholders and others in our contacts database for as long as it remains current. When we become aware that information is no longer accurate, for example, a member representative is no longer with a member company, we delete the information from our contacts database within 48 hours. We also remove a member representative record from the contacts database when they have not logged on to the members website within the last 12 months.

We destroy information about conference or training attendees after two years.

Accessing and correcting your personal information

We endeavour to ensure that the information we hold in our records is accurate, complete and up-to-date taking into account the purpose for which we use or disclose it. However, if you become aware that information we hold about you is incomplete, inaccurate or out of date you can contact us in writing to let us know.

You have a right to access the personal information we hold about you. Unless there is a lawful reason not to, we will give you access to it and allow you to correct any wrong information.

We will ask you to verify your identity to ensure we don't give information to the wrong person. We usually do this by asking member representatives to ask for access using their company email address. In the rare event that we don't give you access to your personal information or refuse to correct it we will tell you why. You may ask us to make a note of your requested correction to be located alongside information we have not agreed to correct.

In the case of individual requests for access to your continuing education program record, we may not be able to locate your record, particularly if you attended the course a long time ago and you are unable to give us sufficient details about previous names (if applicable) when or where you attended the course or to provide a student identifier.

Our contact details are at the end of this policy.

How to make a complaint and contact details

In the event that you have a question, concern or complaint about the way in which we handle your personal information, you should contact our Privacy Officer direct at:

Medicines Australia
Level 1, 16 Napier Close, Deakin ACT 2600
Phone: (02) 6122 8500
Fax: (02) 6122 8555
Email: privacy@medicinesaustralia.com.au

If you are unsatisfied with our response you can complain to the Office of the Australian Information Commissioner – Telephone 1300 363 992