



Policy Circular 7 — January 2016

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NATA Privacy Policy



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NATA Privacy Policy

Purpose

NATA is committed to safeguarding the personal information entrusted to us by our members and clients. We manage your personal information in accordance with the Australian Privacy Principles (APP's) contained in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*. This policy describes how we manage any personal information we hold. (Personal information means any information that may be used to identify an individual.)

This policy applies to NATA and to any person providing services on our behalf. A copy of this policy is provided on the NATA website and is available to any members, clients and the general public.

NATA's services

NATA is Australia's national laboratory accreditation body as recognised in a Memorandum of Understanding with the Commonwealth Government. NATA provides a range of accreditation programs including:

- Accreditation programs in a range of testing and calibration fields of activity
- Accreditation of inspection bodies
- Accreditation of reference material producers
- Accreditation of proficiency testing scheme providers
- Accreditation of medical imaging practices
- Accreditation of sleep disorders services

NATA is also Australia's national compliance monitoring authority for the OECD Principles of Good Laboratory Practice.

NATA also provides services that complement accreditation activities including:

- Provision of advice to enquirers requiring the services of NATA accredited facilities
- Training through NATA's Training Services Department and via seminars and web-based training programs
- Provision of a publicly available listing of accredited facilities
- Provision of technical documents concerning NATA and its activities

Personal information

NATA collects personal information from the following individuals:

- Authorised representatives
- Laboratory/facility contacts
- Laboratory/facility personnel
- Assessors/technical advisers
- NATA Committee members
- Training course and seminar registrants
- General members of the public who voluntarily give such information

The personal information held by NATA will vary depending on your relationship with NATA. It may include your name; position; professional qualifications; business address; business telephone, mobile phone and fax numbers; home address; home telephone; fax and personal mobile phone numbers; e-mail address; memberships of professional associations and your employment history.

If you choose not to provide personal information, we may not be able to provide you with the services you require or we may not be able to appoint you to a position (e.g. assessor, committee member) for which you have been nominated.

Collection of solicited personal information

NATA collects personal information in a number of ways including:

- Directly when information is provided in person or in documents such as an application form, request form or questionnaire
 - When you use the NATA website and/or request access to Members Portal
 - From publicly available sources of information

The information that NATA will collect about you when you use the NATA website and/or Members Portal will depend on how you use the facilities offered by the NATA websites.

If you need to access any secure area of the NATA website and/or Members Portal, you will be required to apply for access using access request forms. The information you provide using these forms is used by NATA to check your identity and eligibility for access to the secure areas.

Members Portal and the NATA website offers a number of interactive facilities including search engines, document or file upload/download capability, as well as online enquiry forms. Other than from enquiry forms, NATA generally does not capture any personal information that you may enter when using these tools. If you complete an online enquiry form, the information that you enter into the online form will only be collected by us if you submit your online enquiry. Only if required, this information may be passed to a third party to help answer your enquiry, and for no other purpose. If at any stage you cancel your enquiry or log out prior to submitting your enquiry, the information you have entered up to that point will not be retained by NATA.

NATA may from time to time collect sensitive information, e.g. memberships of professional associations, outcomes of hearing tests, visual impairment status. Collection of this sensitive information is necessary to enable NATA to carry out one or more of its activities. Where practicable and reasonable, NATA will seek the consent of the individual concerned at the time of collection. Otherwise NATA considers that a permitted general situation exists.

Use and disclosure of personal information

We use member and client personal information for the purpose for which the information was collected. This may include to:

- Conduct and provide the services described above (see NATA's Services)
- Administer and manage those services including charging, billing and collecting debts
- Seek feedback from you on ways to improve NATA's services
- Respond to your queries or feedback
- Provide you information on NATA's activities and services
- In response to a specific enquiry, provide you information on NATA accredited facilities

Personal information may be disclosed to organisations outside NATA. Such organisations may include:

- Government and regulatory authorities and other organisations, as required or authorised by law
- Government and regulatory authorities and other organisations with which NATA has a Memorandum of Understanding or similar formal agreement¹
- Accreditation bodies with which NATA has a Mutual Recognition Agreement (MRA)²
- Auditors conducting MRA audits or other similar evaluations
- Professional advisers including accountants, auditors and lawyers
- Credit providers
- Outsourced service providers managing NATA services including:
 - debt-recovery
 - mailing
 - photocopying

1. Details of any applicable agreements with overseas organisations will be listed under the agreements section of the NATA website, www.nata.com.au

2. Listings of NATA's overseas MRA partners are available via the websites of APLAC (www.aplac.org) or ILAC (www.ilac.org)

Although NATA seeks to ensure that any third parties to whom your personal information is disclosed comply with the requirements of the Privacy Act, NATA is not responsible for the misuse of personal information by these third parties.

NATA does not sell, lease or licence your personal information or use your information for direct marketing, other than where it may relate to the primary purpose of the collection.

Quality of and access to personal information

NATA takes all reasonable precautions to ensure that the personal information collected, used and disclosed is accurate, complete and up-to-date. The accuracy of the information is, however, dependent to a large extent on the information with which we are provided. NATA strongly recommends that you:

- Advise us if there are errors in your personal information at any time
- Keep us up to date with changes to your personal information.

Wherever possible, NATA will correct any error on request. In some cases we may ask for a written request for correction.

Individuals have a right to access their own personal information in a record that is in the custody or under the control of NATA, subject to some exceptions. For example, organizations are required under the Privacy Act to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

Security of personal information

NATA protects personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorised access to personal information.

NATA takes reasonable steps to preserve the security of personal information collected when you use the NATA websites. If your browser is suitably configured, it will advise you whether the information you are sending us will be secure (encrypted). If secure transmission is indicated, NATA currently uses 128 bit Secure Socket Layers (SSL) encryption.

Unfortunately, no data transmission over the internet can be guaranteed as totally secure. Accordingly, although NATA strives to protect such information, NATA cannot ensure or warrant the security of any information you transmit to us or from our online products or services and you do so at your own risk. Once we receive your transmission, we take reasonable steps to preserve the security of the information in our own systems.

The Members Portal architecture ensures that all documents submitted are stored within NATA's internal document management system and remain behind the enterprise firewall together with SSL Certificate for additional security. Documents and/or files you provide to NATA by uploading via Members Portal will be accessible only by authorised personnel.

NATA may also communicate with its members electronically through the use of Members Portal infrastructure, for example uploading documents / files on the Members Portal for a specific member to access. Each Members Portal account is only accessible to the authorised user.

NATA's information systems are administered and managed by NATA's dedicated Information Technology Department. Additionally, off-site back-ups of these information systems are maintained in an external Datacentre compliant with ISO27001.

We use appropriate security measures when destroying personal information, including shredding paper documents, records, and permanently deleting electronic records on their statutory expiration.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

You may make a request for access to your personal information by writing to our General Manager, Compliance & Governance (contact details below). You must provide sufficient information in your request to allow us to identify the information you are seeking. NATA reserves the right to charge a fee for searching for and providing access to your personal information.

Complaints

Complaints about a breach of the APP's can be made by writing to our General Manager, Compliance & Governance (contact details below) or via the 'contact NATA' section of the NATA website, www.nata.com.au. Complaints will be managed and investigated in accordance with NATA's complaint handling procedure. A written response will be provided at the conclusion of the investigation.

Updating this policy

This policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. Updated versions of this policy will be published on the NATA website from time to time.

Contact details

If you have any questions in relation to privacy, please contact:

Tony Vandenberg
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AMENDMENTS

The table below provides a summary of changes made to the document with this issue.

Section	Amendment
Contact Details	Change of address, Melbourne office