

## DIETITIAN SUPERVISION RESOURCES AUSTRALIA PRIVACY POLICY

### 1. ABOUT THIS PRIVACY POLICY

- (1) Welcome to our website. We are committed to our vision of advancing dietetics and resources to Dietitians who are seeking support for their professional practice, development and wellbeing through supervision. This website (**'Website'**) is owned and operated by Dietitian Supervision Resources Australia DSRA (ABN 70 130 316 799) (**"DSRA"**).
- (2) DSRA grants licenses to its members (our **"Members"**) to access online digital content (**"Digital Content"**) for supervision services in relation to dietetic practice including downloadable templates, webinars and other resources as well as exclusive services to our Members such as the supply and purchase of professional supervision services that are advertised on our Website from time to time (our **"Membership Services"**).
- (3) DSRA is committed to maintaining the security of Personal Information (**'Personal Information'**) provided to us. When you share Personal Information with us, we treat it with care and take our responsibility to protect it seriously.
- (4) This Privacy Policy clearly describes our privacy practices and how we collect, use, process, and manage your Personal Information.
- (5) We adhere to the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (the **'Privacy Act'**).
- (6) By subscribing to our Membership Services, you consent to the collection, use and storage of your data through your use of our Membership Services as described in this Privacy Policy.
- (7) Any reference to "DSRA", "we", "our", or "us" means DSRA Pty Ltd (ACN 622 547 291). Any reference to "you, or "your" means you as a Member to our Membership Services.

### 2. MEMBERSHIP SERVICES

- (1) To obtain access to our Membership Services, you must sign up for a customer portal account (**'Member Account'**) and register to our Membership Services.
- (2) By signing up for a Member Account, you will be required to accept our [Terms](#) and Privacy Policy by clicking the "Become a Member" button in the user interface as a condition of joining as a Member. By clicking the "Become a Member" button you agree to all the terms and conditions of our [Terms](#) and Privacy Policy which gives notice to you through our user interface as follows:

*By **Registering**, you agree that you've read and accepted our website Terms and Conditions and you consent to our Privacy Policy.*

### 3. WHAT PERSONAL INFORMATION IS COLLECTED

- (1) "Personal Information" is information or an opinion that can reasonably identify an individual (s 6(1) of the Privacy Act).
- (2) We receive and store Personal Information you provide to us through your use of our Membership Services.
- (3) We may ask you to provide Personal Information such as your name, payment details, address and email address to enable us to provide you with our Membership Services, to provide you with membership information, sales and marketing actions, process your subscription orders, provide updates and to meet our contractual obligations under the [Terms](#).
- (4) We may collect additional data from Members at other times, including but not limited to, when you provide feedback, when you provide content and data in connection with the Membership Services, change your content or email preference, respond to surveys and promotions, or

communicate with our customer support through electronic media including by the Internet, phone, text messages, emails and newsletters.

- (5) DSRA processes payments for subscriptions to Members who offer their services (“**Supervision Services**”) through the gateway payment provider (e.g., Paypal or Stripe) published on our Website (“**Payment Processing Service**”) or any other payment method that we authorise in writing including payment by bank deposit.
- (6) DSRA may also collect any other Personal Information you provide while interacting with us through the supply of our Membership Services.
- (7) DSRA does not collect the following types of sensitive user data from Members when you open a Member Account:
  - (a) personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs;
  - (b) trade-union membership;
  - (c) genetic data, biometric data processed solely to identify a human being;
  - (d) data concerning a person’s sex life or sexual orientation.

#### **4. HOW WE COLLECT YOUR PERSONAL INFORMATION**

- (1) DSRA collects Personal Information from you in a variety of ways, including when you interact with us electronically or in person, when you access our Membership Services and when we provide our products and services to you.
- (2) We may also receive Personal Information from third parties in connection with the supply of our Membership Services. If we do, we will protect your Personal Information in accordance with this Privacy Policy.

#### **5. HOW WE USE YOUR PERSONAL INFORMATION**

- (1) DSRA uses your Personal Information and you consent to us using your Personal Information to:
  - (a) supply you with our Membership Services and products and services in accordance with our [Terms](#);
  - (b) provide you with information and updates about our Membership Services and our products and services;
  - (c) deal with your requests, complaints and enquiries;
  - (d) communicate with you by a variety of measures including, but not limited to, by telephone, email, SMS, newsletters or mail;
  - (e) sending you service messages about your membership, subscription or account sign up;
  - (f) manage, research and develop our Membership Services including through data analytics;
  - (g) administer our business activities; and
  - (h) investigate any complaints.
- (2) If you choose to withhold your Personal Information, it may not be possible for us to provide you with our Membership Services or for you to access certain parts of our products and services and for us to respond to your query.
- (3) You may share your Personal Information with others when you make something public including on our Website which the public can access or see, for example, when you purchase a business listing on our Website where various types of information about you and your business will be publicly displayed on our Website listings including for Supervision Services listings.

## **6. DISCLOSURE OF YOUR PERSONAL INFORMATION AND THIRD PARTIES WITH ACCESS TO IT**

- (1) We will only share your Personal Information where you have given us your consent, and only for the purposes described in this Privacy Policy.
- (2) We may disclose your Personal Information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy. Personal data is only supplied to a third party when it is required for the delivery of our Membership Services.
- (3) We may share your Personal Information with third-party service providers to help us provide our Membership Services, and to provide you with a payment platform.
- (4) When we disclose your data to third-party service providers we do so on the basis that your data is treated with confidence, and only used for the limited purpose of providing support for our Membership Services, and in a manner consistent with this Privacy Policy.
- (5) We may from time to time need to disclose Personal Information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
- (6) If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our Member databases, together with any Personal Information and non-Personal Information contained in those databases.

## **7. DATA RETENTION**

We retain your data for the term that you hold a Member Account with us. Your Personal Information will be maintained for thirty (30) days after you have closed your Member Account with us. After the 30-day period is up, your Member Account and all your Personal Information and data will be permanently deleted including any content such as information, data, works and materials (including without limitation, text, graphics, images, audio material, video material, audio-visual material, scripts, software and files) that a Member submits to us or our Website for storage, or publication on, processing by, or transmission via, our Website.

## **8. SECURITY OF YOUR PERSONAL INFORMATION**

- (1) We are committed to ensuring that the data you provide to us is secure.
- (2) To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, such as encryption of Personal Information, to safeguard and secure data and protect it from misuse, interference, loss and unauthorised access, modification and disclosure. These measures include the use of software and other electronic measures such as Captcha, firewall, logs and email notifications.

## **9. ACCESS TO AND HOW YOU CAN CONTROL YOUR PERSONAL INFORMATION**

- (1) You may request details of Personal Information that we hold about you in accordance with the provisions of the *Privacy Act 1988* (Cth).
- (2) If you would like a copy of your data or believe that your data is inaccurate, out of date, incomplete, or irrelevant, please contact us at [How to Contact Us](#).

## **10. THIRD-PARTY TOOLS**

- (1) We may use technologies and third-party subscription services that use Google Analytics, pixels, tags and web beacons (code snippets) to improve user experience of our Website and to analyse how our Membership Services are used.
- (2) The information collected is mostly anonymous traffic data aside from the approximate location (IP address) and may include browser type, device information, and language. The information

collection is in aggregate form so that it cannot identify any individual user and provides an overview of how people use our Membership Services. It is not used for any additional purpose.

## **11. COOKIES**

- (1) Cookies are small text files that can be stored on your computer, tablet or mobile device when you visit a website. These small files contain information about browsing activity. Cookies are used to identify you when you come back to a website and store details about your use of the website. In addition, cookies can be used to analyse traffic and may be used to serve relevant ads to website visitors through third party services such as Google AdWords.
- (2) We may use persistent and session cookies to track your use of our Website. Persistent cookies are stored as a file on your computer and remain there when you close your web browser. Session cookies are only stored on your computer during your web session and are automatically deleted when you close your browser.
- (3) We use cookies to improve user experience. This enables us to understand how you use the site and track any patterns with regards how you are using our Website. Cookies allow us to distinguish you from other users, so that we can recognise you each time you visit. Cookies also allow us to store user preferences and provide you with a positive experience when you browse this Website, including enabling you to personalise Website settings.
- (4) You may opt-out from the collection of cookies by editing your browser options, but certain features of our Membership Services will not function if you disable cookies. To find out how to manage cookies on browsers, visit the specific browser developer's website. To opt out of being tracked by Google Analytics, visit <https://tools.google.com/dlpage/gaoptout>

## **12. LINKS**

Our Membership Services may from time to time have links to other sites not owned or controlled by us. Links to third party sites do not constitute sponsorship or endorsement or approval of these sites. DSRA is not responsible for the privacy practices of other such sites.

## **13. COMPLAINTS ABOUT PRIVACY**

If you have any complaints about our privacy practices, please contact us. We take privacy seriously and will respond promptly to your notice.

## **14. CHANGES TO THIS PRIVACY POLICY**

We may modify this Privacy Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting on our Website.

## **15. HOW TO CONTACT US**

- (1) This Website is owned and operated by Dietitian Supervision Resources Australia DSRA (ABN 70 130 316 799).
- (2) Our principal place of business is at Gordon Chambers 3/780a Pacific Hwy Gordon NSW 2072, Australia.
- (3) Member can contact us by email at the following address: [info@dsra.com.au](mailto:info@dsra.com.au)

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