

## Privacy Policy

### Introduction

CPD Home is committed to ensuring the privacy of its subscribers. The purpose of this policy is to share with subscribers how we handle their personal information and protect their privacy in accordance with relevant legislation. We are subject to and comply with the *Privacy Act 1988* (Cth) and other applicable State and Territory privacy law. There is more information about these laws on the Australian Information Commissioner's [website](#).

This policy outlines the way CPD Home collects, holds, uses, and discloses personal information, and the procedures that allow access to this information. The policy also outlines how CPD Home will respond to suspected or known data breaches of personal information.

### Who are we?

doctorportal Learning Pty Ltd, trading as 'CPD Home' is a jointly owned subsidiary of the Australian Medical Association (WA) Inc, and Australian Society of Anaesthetists.

CPD Home is available to non-exempt medical practitioners in Australia at [www.cpdhome.org.au](http://www.cpdhome.org.au). It is not limited to members of the AMA.

CPD Home provides CPD services for medical practitioners, including the provision of the CPD Program of Learning, directing subscribers to high-quality accredited CPD relevant to medical scopes of practice, and supporting attainment and management of CPD via in-house bespoke specialist CPD tracking software known as the CPD Tracker.

### What personal information do we collect and how do we collect this?

CPD Home collects personal information from persons enquiring about or applying for the CPD Home service. This may include subscribers, members of the public, journalists, government agencies and other organisations seeking information or comment about our services, visitors to our website, and individuals purchasing services from us and from our suppliers. CPD Home will do its utmost to protect any sensitive information collected in the process.

Personal information is collected directly and indirectly where required from individuals when they subscribe or make contact with CPD Home. Personal information may include full name, contact details, payment details and may include other personal information (e.g. professional details). Information collected may be provided directly by you such as when completing a form, corresponding, or communicating with us (including in person, digitally, telephonically or electronically).

CPD Home may also collect personal information indirectly via publicly available sources such as websites, social media, directories and databases. Personal information may also be collected indirectly while providing a service or managing a complaint. This may include via authorised representatives of the individual; CPD activity supporting documents; CPD Home staff or service providers; regulatory bodies authorities and bodies, professional or specialist societies or associations.

We also collect information about subscribers' use of the service, such as module completions or module views.

### How do we use and store your personal information?

CPD Home uses this information to:

- verify your eligibility to access the services of the CPD Home and any applicable discounts;
- inform you about the services, learning, products, events and publications we provide;

- provide you with CPD Home services;
- enable the CPD tracking software to assist you to manage your CPD activities and reporting;
- improve our services, for example, to understand which learning topics are popular or to support website improvements for subscribers;
- communicate with you about your CPD compliance; and
- report your compliance status to the Medical Board of Australia to meet the CPD Standards framework.

We store your information in electronic systems housed in the Cloud under our control. We take appropriate steps to protect the security of the information we hold about you, including protections against unauthorised access, virus or other electronic intrusions, fire, theft or loss. We require any contracted providers of IT services to do the same.

Our staff are bound by strict requirements regarding the protection of the privacy of the information we collect and hold about you. We or any contracted providers of IT services may use servers, systems and cloud computing providers outside of Australia. Our contracts with them require them to protect the privacy of your information when held on these servers and/or using cloud computing. Our contractors are also required to comply with the *Privacy Act 1988* (Cth).

### **What about use of personal information for direct marketing?**

Australian privacy law limits the use of personal information for direct marketing of goods and services. We use your personal information to keep you informed about CPD Home services, products, events and publications.

Where we send you direct marketing material about our services we provide you with a means to advise us that you no longer wish to receive some or all of this material.

If at any time you have a concern about direct marketing material you have received from us, or you wish to change your preferences in relation to receipt of future material, please contact us at [enquiries@cpdhome.org.au](mailto:enquiries@cpdhome.org.au)

### **How can CPD Home subscribers update or amend their information?**

CPD Home subscribers can easily update their information by visiting [www.cpdhome.org.au](http://www.cpdhome.org.au) or by contacting the CPD Home team by email: [enquiries@cpdhome.org.au](mailto:enquiries@cpdhome.org.au).

### **Do you have a right to see what information we hold about you?**

Under the *Privacy Act 1988* (Cth), you have rights of access to personal information we hold about you. These rights also include correction of any errors in this information. Should you wish to access this information, please contact us at [enquiries@cpdhome.org.au](mailto:enquiries@cpdhome.org.au). Unless the access you request will require special steps or significant resources, there will be no charge for providing you with this access.

### **Do you send my information overseas?**

In addition to the use from time to time of data storage and cloud providers, we may provide deidentified data to overseas bodies. For example, we may provide deidentified data in report on uptake of specific learning activities to a certified learning provider which could be based overseas.

### **For how long do you keep my personal information?**

We generally keep your personal information active for as long as is reasonably required to enable us to meet your needs. We keep subscriber records and other personal information on file to enable us to undertake statistical and historical analysis and reporting. As part of our data security, we regularly backup and archive our electronic databases.

Non-subscriber information will be retained for up to 7 years.

## What happens should you suspect or there is a data breach?

If we suspect or know there has been a data breach, in line with the Australian Information Commissioner’s guide for managing and responding to data breaches, we will act to:

- **Contain** - the breach to prevent any further compromise of personal information;
- **Assess** - the situation to determine how the breach occurred and evaluate the risks, including any potential harm to affected individuals, and where possible take remedial action to reduce any risk of harm;
- **Notify** – individuals and the Commissioner, as may be required, and in a manner deemed appropriate; and
- **Review** - the incident and take action to prevent further breaches.

## Where can I find out more?

If you would like further information regarding how we collect, store, use or disclose your personal information, or have any issues or concerns, please contact CPD Home by emailing [enquiries@cpdhome.org.au](mailto:enquiries@cpdhome.org.au).

## Related Documents / Legislation

The following documents are related to this policy.

1. [Privacy Act 1988](#)
2. Office of the Australian Information Commissioner - Data breach preparation and response  
A guide to managing data breaches in accordance with the Privacy Act 1988 (Cth)

## Appendices

1. Glossary

## Version Tracking

Version	Approval Effective Date	Comments
1.0	December 2022	
1.1	September 2024	Updated Introduction to reflect the joint ownership of CPD Home. Amended CPD Home Program of Learning start year from 2023 to 2024. Removed unrelated glossary terms.

## Appendix 1

### Glossary

Term	Definition
Certified Learning Provider	A learning provider who is certified by CPD Home and can apply for accreditation of a CPD activity for listing in the CPD Learning catalogue.
CPD services	Carrying out ‘CPD Home’ related functions or activities offered to subscribers.
CPD Tracker	Online tracking tool enabling subscribers to record courses, events and other completed CPD activities. Each CPD activity record includes the length of time, area for self-reflection and optional storage of learning evidence.
CPD Home Program of Learning	The CPD Home Program of Learning (CPD Program) provides a pathway for Australian registered medical specialists, international medical graduates, PGY2+ trainees and non-vocationally registered doctors to

	engage in an accredited CPD program. From 1 January 2024, the CPD Program is a mandatory program for subscribers to the CPD Home service.
CPD Year	The CPD Year is 1 January to 31 December.
Decision maker	Any person or persons making decisions for or on behalf of CPD Home.
Personal information	Personal information includes a broad range of information such as name, gender, contact details, financial information and may also include other personal information (e.g. professional details) or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.
Sensitive information	Sensitive information is personal information that includes information or an opinion about an individual's: <ul style="list-style-type: none"> <li>• racial or ethnic origin</li> <li>• political opinions or associations</li> <li>• religious or philosophical beliefs</li> <li>• trade union membership or associations</li> <li>• sexual orientation or practices</li> <li>• criminal record</li> <li>• health or genetic information</li> <li>• some aspects of biometric information</li> </ul>
the Standard	<i>MBA Registration Standard: Continuing Professional Development</i>