

## Racing Analytical Services Limited Privacy Policy

### Background

Racing Analytical Services Limited (**RASL**) is an international racing laboratory and provides sophisticated drug testing services for equine, canine and human samples. Human and Supplement Testing Australia (**HASTA**) is a division of RASL which provides supplements testing and certification. References to RASL in this document include HASTA.

This Privacy Policy has been developed and adopted by RASL to meet the requirements of the *Privacy Act 1988* (Cth) (**the Privacy Act**). It is founded on the 13 Australian Privacy Principles (**APPs**) endorsed under the Privacy Act.

### 1. Open and Transparent Management of Personal Information

RASL is committed to managing the personal information it collects in an open and transparent way.

This Privacy Policy sets out:

- a) the kinds of personal information RASL collects and holds;
- b) how RASL collects and holds the personal information;
- c) the purposes for which RASL collects, holds, uses and discloses personal information;
- d) how an individual may access personal information about the individual and the way to correct the information if necessary;
- e) how a complaint can be made about a breach of the Policy and how RASL will deal with the complaint;
- f) whether RASL will disclose personal information to overseas recipients;

- g) and if RASL does disclose personal information to overseas recipients, where those overseas recipients are located.

This Privacy Policy is available on RASL's website <https://www.rasl.com.au/>

### 2. Anonymity and Pseudonymity

RASL acknowledges that individuals must have the option of not identifying themselves or of using a pseudonym when providing personal information. In carrying out its sample testing services, RASL's preference is to always receive the samples de-identified. RASL acknowledges, however, that this is not always possible, as explained in clause 6 below.

### 3. Collection of Solicited Personal Information

RASL will not collect personal information unless the information is necessary for one or more of RASL's functions or activities, as provided in clause 6 below.

RASL will not collect sensitive information about an individual unless the individual consents and the information is reasonably necessary for one or more of RASL's functions or activities.

RASL will collect personal information only by lawful and fair means.

Clause 6 sets out the purposes for which RASL requires personal information.

### 4. Dealing with Unsolicited Personal Information

If RASL receives unsolicited personal information it will determine if the information could have been collected for one or more of its functions or activities. If so, it will treat it the same way as it would solicited personal information. If not, RASL will destroy or de-identify the information.

## **5. Notification of the Collection of Personal Information**

When RASL collects personal information from an individual, RASL will ensure that the matters set out in this Privacy Policy have been communicated to the individual.

## **6. Use or Disclosure of Personal Information**

RASL's primary purpose is to provide drug testing services to the thoroughbred, standardbred and greyhound racing industries. RASL also provides workplace (employee) drug testing services and maintains a research section focused on traditional and non-traditional doping agents in racing and performance enhancement.

HASTA, which is a division of RASL, provides supplements testing, certification and human hair testing services.

Human testing samples provided by the racing industry for RASL testing are always de-identified. In some circumstances, human samples provided to RASL for testing by non-racing clients are submitted with accompanying personal information, such as the name and date of birth of the person whose sample is being tested. The personal information is not required by RASL to carry out its testing function, but it is required by the client for their own identification and result management purposes. RASL uses the personal information solely to provide the service it has been engaged by its client to provide. It is not disclosed to any other entity or used for any other purpose unless consent is obtained or it is required or authorised by law.

As RASL is not the collector of the personal information in the first place, it requests an assurance from its clients that all personal information has been collected in accordance with the Privacy Act and the individual has consented to his or her personal information being disclosed to RASL for the stated purpose. RASL's preference is to receive the samples and the personal information in a de-identified form and continues to encourage its clients to update their practices to achieve this.

RASL will also receive personal information from employees, prospective employees, clients, suppliers and other service providers necessary to carry out the administrative tasks associated with providing its services. This includes employing people, preparing invoices or entering into service

agreements. The kinds of information collected in these circumstances are names, addresses, email addresses, dates of birth and telephone numbers. For employees, this may also include tax file numbers and bank account details. RASL uses this personal information solely to fulfil the specific function it has been collected for. It is not disclosed to any other entity or used for any other purpose, unless consent is obtained or it is required or authorised by law.

## **7. Direct Marketing**

RASL does not use or disclose personal information for direct marketing.

## **8. Cross-border Disclosure of Personal Information**

RASL does not disclose personal information to overseas entities.

## **9. Adoption, Use or Disclosure of Government Related Identifiers**

RASL does not adopt government related identifiers as its own.

RASL may from time to time enter into an agreement with a client which is defined under the Privacy Act as an *agency or a State or Territory authority*, and which uses government related identifiers. In those circumstances, RASL will receive the government related identifiers from the client and will use them solely for the purpose of performing the services for the client. This will generally be to carry out drug testing services. The government related identifiers are not required by RASL to carry out its testing function but required by the client for their own identification and result management purposes.

## **10. Quality of Personal Information**

RASL takes all reasonable steps to ensure the personal information it collects, uses, receives from its clients or discloses, is accurate, up-to-date and complete.

## **11. Security of Personal Information**

RASL takes all reasonable steps to ensure the security of the personal information it holds. This includes making sure it is not misused, interfered with, lost or accessed by those without authorisation. RASL stores all personal information securely on its computer network which is backed up by a server and to tapes. Paper and electronic records including drug testing results are stored

securely onsite and offsite at a government approved archiving facility. All samples provided for testing purposes are stored securely with limited authorised access, in locked freezers, fridges or cabinets as appropriate.

If RASL no longer requires the personal information for the purpose it was provided, RASL engages a company with expertise in document destruction to destroy the information. Negative drug test results are retained for up to 7 years, while positive results are stored either indefinitely or for a period instructed by the client.

All RASL employees are bound by confidentiality clauses in their employment contracts and when they commence employment at RASL, they agree to be bound by RASL's workplace policies which include this Privacy Policy. RASL also conducts regular workplace training for its employees, which includes training on confidential information and privacy issues.

## **12. Access to Personal Information and**

## **13. Correction of Personal Information**

If an individual requests access to his or her personal information, RASL will provide access, unless access is unlawful or another valid exemption applies (as set out in APP 12).

If RASL becomes aware that personal information it is holding about an individual is inaccurate, out-of-date, incomplete, irrelevant or misleading, RASL will take all reasonable steps to correct the information.

A request to access or correct personal information must be made in writing addressed to RASL's Privacy Officer (details set out below). RASL will respond to the request as soon as practicable and use all reasonable endeavours to correct the information in a timely manner.

## **Further Information**

For clarification or further information about this Privacy Policy, please contact RASL's Privacy Officer.

## **Complaints**

If an individual wishes to make a complaint about RASL's handling of his or her personal information, please address the complaint, in writing, to RASL's Privacy Officer. RASL will respond to the complaint within 30 days and will ensure it is treated in

confidence and in accordance with the principles of natural justice.

### **Mail:**

Attention Privacy Officer  
Racing Analytical Services Limited  
400 Epsom Road  
Flemington VIC 3031

### **Email:**

[privacyofficer@rasl.com.au](mailto:privacyofficer@rasl.com.au)

### **Telephone:**

*You may telephone RASL on the following number, however, all requests which require follow up or action, must be in writing.*

03 9376 6760

### **Useful Links**

[www.rasl.com.au](http://www.rasl.com.au)

[www.hasta.org.au](http://www.hasta.org.au)

[www.oaic.gov.au](http://www.oaic.gov.au)

*This Privacy Policy was approved by RASL on 30 November 2018.*