

## **ALLIED HEALTH SPECIALIST CONSULTANTS – PRIVACY POLICY**

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online. Personal information may be collected or provided to us, including by or via allied health professionals, government bodies or by individuals themselves. When we refer to 'Site' in this Privacy Policy, we refer to our site available at http://www.ahsc.com.au/. In this Privacy Policy we, us or our means Jackie O'Connor trading as Allied Health Specialist Consultants ABN 34 576 591 221.

## **Personal information**

The types of personal information we may collect, including where we collect this information from, are outlined below:

Information we may collect about a person from allied health professionals or government bodies:

- a person's name;
- a person's location, contact details or Medicare number;
- a person's age and/or date of birth;
- a person's weight and height; and
- a person's sensitive information as set out under the section titled 'how we treat personal information that is also sensitive information'.

Information we may collect from people directly:

- name and contact details (for example, if an individual contacts us regarding our services on behalf of their employer or principal, we collect that individual's name and contact details to correspond with them about their enquiry); and
- details about a business entity (we may collect details identifying our clients, including Australian business numbers and business names).

General data we might receive about or from an individual, when using our Site:

- browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour; and
- information about an individual's access and use of our Site, including through the use of Internet cookies, an individual's communications with our Site, the type of browser the individual is using, the type of operating system being used and the domain name of the relevant Internet service provider;
- additional personal information that an individual provides to us, directly or indirectly, through their use of our Site; and
- any other personal information requested by us and/or provided by the individual or a third party.

As we note above, we may collect these types of personal information directly from an individual or from third parties.

## Collection and use of personal information

We may collect, hold, use and disclose personal information (excluding sensitive information) for the following purposes:

- to enable individuals to access and use our Site;
- to contact and communicate with an individual (if an individual, such as a client representative, has contacted us regarding our services, we require personal information so we can identify who we are dealing with and how to contact them);
- for internal record keeping, administrative purposes, invoicing and billing purposes;
- for marketing in limited circumstances, including to send individuals information about our services;
- to comply with our legal obligations and resolve any disputes that we may have; and
- if an individual applies for employment with us, to consider an employment application.

# Disclosure of personal information to third parties

We may disclose personal information:

• (excluding sensitive information) on occasion, to our marketing services providers, for them to help us with our marketing;

- (excluding sensitive information) third parties to collect and process data, such as Google Analytics or other relevant businesses. This may include parties that store data outside of Australia;
- (including sensitive information) to our third party storage and hosting providers, as they help us store all our business information and the personal information we hold about individuals;
- (including sensitive information) to our employees, contractors and/or related entities so they can assist us in performing our services (we ensure that our staff and contractors have agreed to obligations of confidentiality); and
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights.

# How we treat personal information that is also sensitive information

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles (APPs) and in our case, as we are a business located in Victoria, the Health Privacy Principles (HPPs) as found in the *Health Records Act 2001* (Vic). Sensitive information as defined in the APPs means information relating to an individual's racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

We collect sensitive information (primarily health information) about individuals in order to provide our services to our clients. We comply with our APP and HPP obligations when dealing with sensitive information and we expect and require our clients to do the same.

## Your rights and controlling your personal information

**Transmission of information:** If you transmit a patient's, employee's or sub-contractor's personal information to us, including any sensitive information, you warrant to us that you have obtained the patient's, employee's or sub-contractor's consent as applicable to disclose their personal information to us for the purpose of us providing services. We will protect the patient's, employee's or sub-contractor's personal information as set out in this Privacy Policy.

**Restriction on direct marketing**: If an individual has previously agreed to us using their personal information for direct marketing purposes, that individual may change their mind at any time by contacting us using the details below.

**Access**: Individuals may request details of the personal information that we hold about that individual. An administrative fee may be payable for the provision of such information.

**Correction**: If an individual believes that any information we hold about them is inaccurate, out of date, incomplete, irrelevant or misleading, that individual should contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date. If individuals request correction to their personal information that a third party may have provided to us, we will need to refer their request to that third party.

**Complaints**: If an individual wishes to make a complaint about how we have handled their personal information, the individual should contact us using the details below and provide us with full details of the complaint. We will promptly investigate the complaint and respond, in writing, setting out the outcome of our investigation and the steps we will take to deal with the complaint.

**Unsubscribe**: To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

## Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at an individual's, or the entity on whose behalf that individual acts, own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot make assurances that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

## **Cookies and web beacons**

We may use cookies on our Site from time to time. Cookies are text files placed in a computer's browser to store a user's preferences. Cookies, by themselves, do not tell us an individual's email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on an individual's social media and online media feeds as part of our retargeting campaigns. If and when an individual chooses to provide our Site with personal information, this information may be linked to the data stored in the cookie.

We may use web beacons on our Site from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the user's behaviour and collect data about the user's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

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## Links to other websites

Our Site may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## **Amendments**

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our Site. We recommend checking our Site regularly to ensure awareness of our current Privacy Policy.

#### For any questions or notices, please contact our Privacy Officer at:

Jackie O'Connor trading as Allied Health Specialist Consultants ABN 34 576 591 221

Email: info@ahsc.com.au

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