

Ramsay Connect Privacy Policy

Privacy Commitment

Ramsay Connect Pty Ltd ACN 639 279 888 (**Ramsay Connect**, also described as **we, our, us**) respects the privacy rights of individuals. Ramsay Connect is committed to complying with all applicable privacy laws including the *Privacy Act 1988* (Cth) and State and Territory laws governing the use of personal information (**Privacy Laws**).

Who does this Policy apply to?

This Privacy Policy applies to our collection, use and disclosure of personal information from customers, nominated support persons, referring doctors and health providers, contracted health professionals, other contractors and suppliers and any other individuals engaged by or providing services to us (collectively **you**).

Terms Used

In this Privacy Policy, we use the following terms:

Personal information is defined in the *Privacy Act 1988* (Cth), and means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

Personal information also includes 'sensitive information' which is information or opinions such as your race, religion, political opinions or sexual preferences, biometric information used for biometric verification or identification, and biometric templates, and health information. Information which is 'sensitive information' attracts a higher privacy standard under the *Privacy Act 1988* (Cth) and is subject to additional mechanisms for your protection.

Health information is defined in the *Privacy Act 1988* (Cth), and is a particular subcategory of 'personal information' and includes information or an opinion about:

- the health or a disability (at any time) of an individual; or
- an individual's expressed wishes about the future provision of health services to him or her; or

- a health service provided, or to be provided to an individual, that is also personal information.

Primary purpose means the specific purpose or activity for which the personal information is collected. Any use or disclosure of the personal information for another purpose is known as the **secondary purpose**.

Related Bodies Corporate has the meaning given to that term in the *Corporations Act 2001* (Cth).

What personal information do we collect?

We only collect personal information (including health information if you receive health-related services from us) that is reasonably necessary to manage our relationship with you, administer the services you request from us, inform you about services we offer and comply with applicable laws. Information collected is only used and disclosed in a manner consistent with Privacy Laws, other applicable laws and this Privacy Policy.

The personal information we may collect, use and disclose will depend on our relationship with you. Examples of personal information we may collect include, but are not limited to:

- personal identification and contact details;
- banking, payment and contribution details;
- health (including clinical) information;
- clinical images;
- records of provision of services, including recordings of telephone conversations;
- employment details and history;
- criminal record or working with children checks; and
- professional registration information.

You have the right not to disclose your personal information to us (for example, remain anonymous or pseudonymous), however, this may limit our ability to provide you with the services you have requested.

If you provide us with unsolicited personal or sensitive information which we do not require to deliver services to you (for example, on a phone call that is recorded), such information will be subject to our normal security arrangements for customer information. We will, where reasonable and legal to do so, destroy or de-identify this information. Where we retain this information, it will be subject to this Privacy Policy.

If we no longer need your personal information for the primary purpose and the legal retention period for keeping this information has passed, we will either destroy or de-identify this information.

This Privacy Policy will not apply to our use of de-identified information because it is not information that identifies you.

How do we collect your personal information?

In most cases, we collect your personal information directly from you, including via:

- face to face interactions;
- written forms;
- correspondence (written and verbal);
- a telephone call, virtual consultation, group sessions or messaging technology;
- the internet, including our website forms; or
- other electronic forms and app-based surveys or questionnaires (for example, patient reported experience measures or patient reported outcome measures).

If it is not reasonable or practical for us to collect the information directly from you, or if you have consented for us to do so, we may collect information about you from another person or organisation. Some examples of where this may occur include where we receive information from:

- a person you have authorised to deal with us on your behalf;
- a third party, such as your treating hospital, or other health service provider or private health insurer; or
- organisations that we have an arrangement with to offer or promote products or services to you.

How do we use and disclose your information?

We only use your information for the primary purpose for which you have given the information to us or for a secondary purpose if an exception applies. The exceptions include:

- the secondary purpose is related to the primary purpose for which you have given us the information (or in the case of sensitive information, directly related to the primary purpose) and you would reasonably expect, or we have told you, that your information

is usually disclosed for another purpose or to other individuals, organisations or agencies;

- you have consented for us to use your information for another purpose; or
- we are required or authorised by law to disclose your information for another purpose.

The following is a list of examples of related secondary purposes for which we may use or disclose your personal information, but is not an exhaustive list:

- to manage, deliver, and administer the services you request from us, for example, arranging equipment to be delivered to you or sending you standard reminders for appointments and follow up care;
- to enable health professionals, including your care team and our subcontractors to provide your treatment, for example assessing your suitability for health care services, referral to another health service provider or providing updates regarding your care to your referring practitioner;
- to liaise with a person who is acting on your behalf, including a guardian, medical treatment decision maker or person appointed under a power of attorney;
- to liaise with your private health insurer or another payer and, where required, provide information to them to verify treatment provided to you, and for the purposes of the evaluation and improvement of our programs;
- for invoicing, billing and account management purposes;
- to develop a case study based on your experience of the services you receive from us, which may be provided to your private health insurer so that they can contact you to further discuss or promote your experiences;
- for activities such as quality assurance processes, complaints management, patient satisfaction surveys and staff education and training;
- to improve our services or offer additional services to you which we believe may benefit you (including special offers and discounts), which may include disclosing personal information to our Related Bodies Corporate; and
- to our Related Bodies Corporate or service providers engaged to carry out functions and services on our behalf (for example, allied health professionals, mailing houses, technology service providers and cloud storage providers). Where we outsource any of our services or hire contractors to provide professional services, we require them to comply with the Privacy Laws and, where applicable, this Privacy Policy.

We respect your rights to choose the material you want to receive and how you wish to receive it, including by electronic means. You can therefore choose to opt out of any communications by calling 1800 799 732 or by unsubscribing to any email communications.

Do we disclose information overseas?

We do not currently disclose any personal information overseas. If we do so in future, we will take reasonable steps to ensure that your information is provided with the same level of protection as it is afforded within Australia. This may be by only engaging with third parties located in a country which we believe have similar Australian privacy laws, or by obtaining confirmation that the third party is able to provide the same level of protection consistent with Privacy Laws.

If we disclose information to an overseas recipient with your express consent or direction, we may not take the above steps in relation to the management of your information.

Data Storage and Information Security

We may store the personal information we collect from you in various forms including hardcopy and electronically. We will comply with the Australian Privacy Principles and this Privacy Policy in relation to all information that is stored by us, no matter what form it is in.

We use a range of security measures to ensure that the personal information collected and held by us is protected from misuse, interference, and loss, and from unauthorised access, modification and disclosure. Additional privacy measures are used to protect sensitive information (such as health information).

We have systems and processes in place designed for this purpose. Only authorised personnel are granted access to your information. We also have processes in place that are designed to identify you when you deal with us by phone, online or face to face so that we only disclose your information to you, or someone properly authorised by you.

You need to keep any access details allocated to you (including your username, password and PIN) confidential and not share them or leave them somewhere that might be easy for others to access or find. Where you allow others to use your access details, or where your credentials are used by others, we will assume that they are you. Let us know immediately if you believe there has been unauthorised access to your information or use of your access details.

Data quality, access and correction

We will take reasonable steps to ensure your personal information is accurate, complete and up to date when we collect, use or disclose it.

You have the right to access personal information we hold about you. You also have the right to request that we correct your personal information held by us if you believe it to be inaccurate, incomplete or out of date.

We will allow access or make the requested changes unless there is a reason under the *Privacy Act 1988* (Cth) or other relevant law to refuse such access or refuse to make the requested change. If we are unable to provide you with access to your information, we will inform you of the reasons why. If we do not agree to change your personal information, we will permit you to make a statement of the requested changes and enclose this with your personal information.

Requests for access or correction can be made by calling 1800 799 732 or writing to us using the details provided below. Your request should include a detailed description of the information required. To ensure information is only disclosed to those entitled to it you may be asked for identification, or in the case of a telephone call asked to answer a series of questions to verify your identity.

Privacy Enquiries & Complaints

If you have an enquiry or complaint about our information handling practices, please contact us by calling 1800 799 732, emailing privacyofficer@ramsayconnect.com.au or writing to:

Operations Manager
Ramsay Connect Pty Ltd
271 Spring Street
Melbourne VIC 3000

We will do our best to resolve any complaint as quickly as possible and to your satisfaction. If you are unhappy with the outcome of your complaint, you may refer your concerns to the Office of the Australian Information Commissioner for further consideration by calling 1300 363 992 or emailing enquiries@oaic.gov.au.

Changes and getting a copy of this privacy policy

We encourage you to review and check regularly for any updates to this Privacy Policy that we publish on our website. By continuing to deal with us, you accept this Privacy Policy as it applies from time to time. If you would like a copy of this Privacy Policy, please contact us.

This Privacy Policy is made on behalf of Ramsay Connect Pty Ltd ACN 639 279 888.

Dated: October 2023

How we handle your personal information when you visit our website

Supplementary to the Privacy Policy above, this section of our Privacy Policy explains how we handle personal information when you visit our website www.ramsayconnect.com.au

Collection

When you use our website, we do not attempt to identify you as an individual user and we will not collect personal information from you unless you specifically provide this to us, for example by way of registration or completion of an online form or if you send an online enquiry to us.

When you use our website, we use the Google Analytics service to record and log for statistical purposes the following information about your visit:

- your computer address;
- your top-level domain name (for example, .com,.gov, .org, .au etc);
- the date and time of your visit;
- the pages and documents you access during your visit; and
- the browser you are using.

Our web-site management team use statistical data collected by Google Analytics to evaluate the effectiveness of our website.

Google makes available a browser "add-on" that prevents Google Analytics from collecting information about website visits—we suggest you refer to the instructions for installation of Google Analytics Opt-out to learn more about this.

We are, however, obliged to allow law enforcement agencies and other government agencies with relevant legal authority to inspect our web server logs, if an investigation being conducted warrants such inspection.

Cookies

A "cookie" is a small bit of data our server sends to your browser that allows our server to identify and interact more effectively with your computer. Cookies do not identify individual users, but they do identify your ISP and your browser type.

The Ramsay Connect website may use cookies. This means that upon closing your browser, the cookie assigned to your computer or device may remain active to enhance your use of the website when you return to the website.

Personal information such as your email address is not collected unless you provide it to us. We do not disclose domain names or aggregate information to third parties other than agents who assist us with the website and who are under obligations of confidentiality. You can configure your browser to accept or reject all cookies and to notify you when a cookie is used. We suggest that you refer to your browser instructions or help screens to learn more about these functions. However, please note that if you configure your browser so as not to receive any cookies, a certain level of functionality of the Ramsay Connect website and other websites may be lost.

Links to third party websites

We may create links to third party websites. We are not responsible for the content or privacy practices employed by websites that are linked from our website. As such, any personal information you provide on these third party websites will be handled under the privacy policies of those platform providers. We encourage you to review the relevant privacy policies prior to using any such third party websites.