



Privacy Policy

A guide to how Salveo Healthcare is committed to protecting your personal information and respecting your privacy.

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Our privacy commitment to you

Salveo Healthcare (ACN 612 056 836) (“Salveo”, “we”, “us” or “our”) recognises the importance of keeping the personal information that you entrust to us private and confidential. This policy has been compiled to outline how your personal information is handled and to inform you of the steps taken by Salveo Healthcare to protect your privacy. Our staff are trained to respect your privacy in accordance with applicable privacy laws and our standards, policies and procedures. We are committed to managing your personal information in an open and transparent manner.

About our privacy policy

This policy outlines how we manage your personal information and how we comply with the *Privacy Act 1988* (Cth) (Privacy Act) and the Australian Privacy Principles (APPs). It also describes in general terms, the types of personal information held, for what purpose personal information is held, and how that information is collected, held, used and disclosed. This privacy policy may be updated from time to time.

This policy applies to all your dealings with Salveo Healthcare, whether it be at one of our offices, electronically or personally with a Salveo Healthcare representative. Our commitment to handling personal information extends to clients (current, prospective and past) and to family members of clients (including a spouse or partner).

What is your personal information?

When used in this privacy policy, personal information has the same meaning given to it in the Privacy Act. In general terms, it is information that can be used to personally identify you such as your name, address, telephone number, email address, profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What is your sensitive information?

When used in this privacy policy, sensitive information has the same meaning given to it in the Privacy Act. In general terms, it is a sub-set of personal information and includes information about your health, genetics, racial or ethnic origins, political opinions, religious or philosophical beliefs, sexual preferences, and criminal history. This information is afforded a higher level of protection under the law due to its sensitive nature. Unless required by law, we will only collect sensitive information with your consent.

What personal information do we collect?

As a client of Salveo Healthcare, certain personal information will be required to establish and maintain your record, and to provide services to you. The personal information we collect will vary depending on the services we provide to you. However, the type of personal information we may collect includes:

- identification information such as your name, date of birth, contact phone details, residential, postal and email addresses, gender, your family/single status, your next of kin, guardian, power of attorney, emergency contacts, Medicare numbers, Individual Healthcare Identifiers, health insurance details and your occupation;
- sensitive information such as health information, and other information we consider necessary to provide health care services to you including your personal medical history, current health issues, health goals, medications, allergies, immunisations, social history, family history, risk factors, areas of interest, ethnic origins and lifestyle patterns;
- details of your care providers including your general practitioner, pharmacist, general treatment providers and other medical providers who may from time to time provide you with medical treatment and advice;
- information about persons who have been designated by you to act on your behalf such as your carer or family members;

- information about health management programs, chronic disease management programs or any other health care programs that you may participate in whether provided by Salveo Healthcare or by another health care provider;
- information about how you use our services, technical information about the services you access, the location of where you use our services; and
- any other information that you provide to us directly, or that is provided to us by the business that employs or engages you to facilitate your use of our services.

How do we collect your personal information?

Where possible, Salveo Healthcare will collect personal information directly from you, however in certain circumstances it may be necessary to collect information about you from third parties. If we receive information about you from someone else, we will take reasonable steps to make you aware of the facts and circumstances of that collection.

We may collect your personal and sensitive information in the following ways:

- when you email, fax, phone or write to us;
- when you have contact with us in person;
- when you register for access to one of our products or services;
- when you enter upload or import data into our products and services;
- when you connect third-party devices, products and services to our products and services;
- when you complete a survey or assessment which may be provided through one of our products or services;
- from hospital, medical and general treatment providers relating to the ongoing management of your health. Under some circumstances, we may contact a service provider who has treated you in the past, if the information would be relevant to your participation and the services you may receive or are to receive in the future;
- from your carer, guardian or holders of your power of attorney;
- from the business, government agency, non-government organisation or health insurance provider that referred you to us (**Program Funder**);
- if you have chosen to opt-in to Australia's eHealth record system, *My Health Record*, then, with your consent, we may collect your personal information from your *My Health Record* in accordance with the *Personally Controlled Electronic Health Records Act 2012* (Cth). An eHealth record is an electronic summary of your key health information such as prescribed medications, allergies and treatments you have received. For more information, please visit www.myhealthrecord.gov.au;
- when you participate in public or closed surveys, questionnaires or conference events;
- when you register for face-to-face or digital events (such as webinars); and
- when you interact with us online, including through our website, email, webchats, mobile applications and social media channels (such as Facebook, Twitter, YouTube, Instagram or LinkedIn – these social media channels will also handle your personal information for their own purposes and have their own privacy policies).

If permitted by law, we may also collect or disclose your personal information in circumstances where your consent cannot be obtained, such as when there is an immediate need to provide you with emergency medical treatment where your state of health and/or life is at risk.

What happens if we receive unsolicited personal information?

If we receive information about you that we have not sought out (referred to as 'unsolicited information'), we will determine whether we would have been permitted to collect that information as part of providing our services in accordance with the law. If it is, we will handle this information in accordance with this policy. If we are not permitted to collect this information, it will be destroyed or deidentified as soon as practicable, but only if it is lawful and reasonable to do so.

Why do we collect certain personal information?

Salveo Healthcare will collect information that we are legally required to do so as a health care provider and to enable us to provide you with our services. We will generally explain at the time we collect your personal information the purposes for which we will use it.

Your health information is collected to enable Salveo Healthcare to assist you in appropriately managing your health. Occupational and ethnical information is collected to assist with possible occupational and ethnical illnesses. Lifestyle information is collected to assist with identifying lifestyle factors that may be negatively impacting your health.

Health insurance details are collected to confirm your eligibility for the services we provide.

While in certain circumstances we are required to collect government identifiers such as your Medicare number and your Individual Healthcare Identifier, we do not disclose this information other than when it is required or authorised by law. Salveo Healthcare uses your health fund membership number and our own client number to identify you.

We may also collect information about you because we are required or authorised by law to collect it.

What use is made of your personal information?

The information that you provide to Salveo Healthcare is used only for purposes that you would reasonably expect in providing you with our services. This may include the following activities:

- to identify you or verifying your authority to act on behalf of a client;
- to establish and maintain your participation;
- to confirm your eligibility for a service;
- to report your Program Funder;
- to update our records and keep contact details up to date;
- to provide you with services appropriate to your needs;
- to process invoices that relate to services provided;
- to answer your enquiries and to provide information to you about our services;
- to process and respond to any complaint made by you;
- to provide effective risk management;
- to provide analysis of information for service development and marketing purposes;
- to meet internal functions such as administration and accounting systems;
- information technology maintenance and development;
- to train staff;
- to investigate and resolve complaints relating to services provided by/or on behalf of Salveo Healthcare;
- to comply with any law or legislative requirements;
- to keep you informed about your participation and other relevant information relating to Salveo Healthcare; and
- for any purpose for which you have given your consent.

Do you have to provide information?

The information collected by Salveo Healthcare is necessary to provide you with a service. Failure to provide information may result in Salveo Healthcare being unable to provide you with the service you want.

Do we use your personal information for direct marketing?

Your contact information may be used to notify you of new services or promotions being offered by Salveo Healthcare and other related services and products, if we have your permission or a legitimate interest in doing so. If at any time you no longer wish to receive this information, you can request to “opt out” from receiving this information by contacting us at general@salveohealthcare.com.au, by using the unsubscribe link in any email or by replying to any SMS or text-message with “STOP”.

If you opt out of receiving marketing communications from us, we may still contact you in relation to our ongoing relationship with you.

Where we market to prospective clients, we are happy to disclose to you how we have obtained this information and will provide the option to 'opt out'.

We will not sell your personal information to any organisation outside of Salveo Healthcare.

What information do we disclose?

The information Salveo Healthcare collects from clients or concerning clients will be kept strictly confidential and secure at all times. Where your personal information is disclosed, it will be disclosed in a manner consistent with applicable privacy laws and regulations and only for a purpose that is consistent with the reason it was originally collected.

Information will be disclosed to third parties in the following circumstances:

- where you would reasonably expect us to in order to provide the service in respect of which the information was originally collected;
- where you have authorised us to do so;
- where we need to enforce or apply any terms of use or contract regarding use of our services to which you have agreed (or other terms that have been agreed to apply to our relationship with you);
- to related health care providers including your general practitioner, in order to provide you with health care services;
- to your Program Funder;
- your family, carer, legal representative, guardians and attorneys in accordance with the law. We require a written authority from you, or from an authorised representative (such as an Attorney under a Power of Attorney) if you would like someone to deal with Salveo Healthcare on your behalf;
- to the *My Health Record System Operator* by uploading information to your eHealth record; and
- where a third party has a confidentiality agreement with Salveo Healthcare and it is required to perform a core business function on behalf of Salveo Healthcare. For example, an agent transacting business for and on behalf of us or a mailing house. Organisations that deliver services on behalf, or to Salveo Healthcare may require your personal information for accounting and auditing purposes, claims assessment, review and analysis or for providing other services and products; and
- when it is authorised by law or we are legally required to do so, for example, in response to a subpoena, court order or other legal process.

Further:

- for *operational reasons* for maintaining, reviewing and developing our business systems, procedures and infrastructure including testing or upgrading our computer systems in order to securely and efficiently deliver our services to you and others;
- in *exceptional circumstances* disclosure of personal information may be deemed necessary when there are grounds to believe that the disclosure is necessary to prevent a threat to an individual's health and

safety, for law enforcement purposes or to protect public health and safety; and

- *for compliance reasons* to ensure compliance with relevant laws and regulations.

De-identified information

We may be required to use your personal information in a de-identified form (de-identification being a process by which a collection of data or information is altered to remove or obscure personal identifiers and personal information) to assist us in running our business. We may also provide de-identified information in an aggregated form to third parties (including your Program Funder) that we have engaged for research, marketing, strategy or other purposes.

When your personal information and health information is included in de-identified, aggregated data, it is not possible to identify you or anything about you from that data.

Do we disclose your personal information to anyone outside Australia?

Salveo Healthcare conducts its business operation within Australia and your information is stored by means of electronic storage within Australia. We commit to review the terms of service of any service provider of cloud or networked data storage to ensure that the security of your personal information is addressed in any service level agreement. We will not disclose your personal information to anyone located overseas without your consent.

How is your personal information protected and how long is it kept?

Salveo Healthcare stores your personal information in different ways, including paper and electronic format. We take the security of your personal information very seriously and take reasonable steps to protect it from misuse and loss, unauthorised access, modification or disclosure.

The methods we use to ensure this includes the implementation or existence of the following measures:

- Salveo Healthcare employees, agents and sub-contractors are bound by confidentiality agreements;
- document storage security policies;
- internal system access security policies including authenticated access of employees and contractors;
- verification procedures to identify an individual before personal information is disclosed;
- access control for our buildings;
- the use of data encryption, firewalls and other security systems for our computer system.

Your information is kept while we need it to provide the services that you have requested from us and where applicable, we are required to keep it to comply with statutory requirements. Where Salveo Healthcare determines it is no longer necessary to hold your personal information we will securely destroy, delete or permanently de-identify that information, wherever possible.

In the unlikely event that security of data is compromised, we will take reasonable steps to confirm any possible breach. If a breach is confirmed, we will notify you and provide you with a description of the breach, the kinds of information involved, and any recommended actions you could take to protect yourself.

Can you deal with us anonymously or using a pseudonym?

Yes, you can deal with us anonymously or using a pseudonym where it is lawful and practicable to do so. For example, if you were making a general inquiry as to the services we provide or as a visitor to our website.

In general, Salveo Healthcare will not be able to deal with you anonymously or where you are using a pseudonym when:

- it is impracticable to do so (including, but not limited to, where you are actively using our services or are

- participating in one of our programs); or
- we are required or authorised by law to deal with you personally.

How can you access your personal information?

If you wish to access your personal information, you can send a request to general@salveohealthcare.com.au. We will give you access to your information in the form that you want it where it is reasonable and practical to do so. In some cases, we may be able to deal with your request over the phone if we are satisfied as to your identity. There may be a charge associated with retrieving your information depending on the complexity of your request. However, we will inform you of any fee payable at the time a request is made.

Access is subject to some exceptions allowed by law. These include where:

- access would pose a serious threat to the life or health of an individual;
- access would have an unreasonable impact on the privacy of others;
- the request is frivolous or vexatious;
- the information relates to a commercially sensitive decision-making process;
- access would be unlawful;
- access would prejudice enforcement activities relating to criminal activities and other breaches of law, public revenue, a security or negotiations with you;
- access would jeopardise the conduct of existing or anticipated legal proceedings;
- denying access is required or authorised by or under law.

If we cannot provide your information in the way you have requested, we will advise you of the reasons in writing.

What if your information is incorrect?

Salveo Healthcare will take reasonable steps to ensure that the information we collect, use or disclose is accurate, complete and up to date. Please contact us at general@salveohealthcare.com.au if you believe that your personal information is inaccurate, incomplete, irrelevant, misleading or out of date.

We will help you manage corrections, whether Salveo Healthcare made the mistake or it was someone else, we will help you identify the original source of the information so that you can ask for the information to be corrected. We will need to verify your identity before we are able to action any request to correct information.

If we are able to correct your information, we will let you know within five business days of deciding to do this. If you ask us to do so, we will advise any relevant third parties of the correction, unless it is impracticable or unlawful for us to do so.

If we are unable to correct your information, we will let you know in writing within five business days of making this decision. If you are dissatisfied with our decision, you can refer your complaint to the Office of the Australian Information Commissioner. Contact details are listed at the end of this policy.

If we agree to correct your information, we will do so within 30 days from when you requested the change, or a longer period that has been agreed with you.

If we cannot make the correction within a 30-day time frame or the agreed time frame, we must:

- let you know about the delay, the reasons for it and when we expect to resolve the matter;
- ask you to agree in writing to give us more time; and
- let you know you can complain to the Office of the Australian Information Commissioner.

If we become aware that the personal information we hold about you is out of date or inaccurate, we may correct the information or ask you to review and correct your information. It is important that you help us by keeping your contact details up-to-date.

Dependents over 16

We will not provide access to, or allow for correction of, any information belonging to a person that is 16 years or older by their parent or guardian, unless it can be proven that the person is not able to exercise sound judgment, is of impaired capacity, or has provided us with the authority to do so.

Salveo Healthcare may allow individuals under the age of 16 to access and correct their personal information if it can be reasonably established that they are able to exercise sound judgment. In this instance, their personal information will be handled in the same manner as a person that is 16 years or older.

Client Correspondence

Any correspondence received by Salveo Healthcare, including via the post, fax or email, is retained and recorded within the company's membership communications. We keep these records in order to maintain the highest possible customer service levels and for any future enquiries. We also retain any correspondence we send to you. We maintain policies and procedures for the retention of documents and data which governs the use of, and access to such material.

Our Web Site

Salveo Healthcare recognises the importance of providing you a secure environment when communicating with us via the Internet and appropriate measures have been put in place to protect your personal information online. For example, when you provide or access your personal information online, we use industry accepted methodology and your secured information is further protected from unauthorised access through the use of firewalls, secure passwords and SSL Certificates.

Salveo Healthcare may collect usage data from your computer when you visit our website through the use of tracking and or cookies. This collection is to enable us to maintain and improve our online service. Any information collected is not linked in any way to personal identification details of clients. Visitors to our website can adjust their browser preferences to prevent the collection of data. However, if you adjust your browser preferences, there may be some features of our website that will not be available to you and/or some pages may not display properly.

How do I make a complaint?

Salveo Healthcare will make every attempt to ensure that your privacy is not breached; however, if you believe that your privacy has been breached, you can contact us at general@salveohealth.com.au or lodge a complaint to the address mentioned below:

The Privacy Officer
Salveo Healthcare
P.O. Box 5377
Launceston TAS 7250

We will endeavor to resolve the issue with you amicably in accordance with our complaints resolution procedure. However, if you believe that we have not resolved the issue you may refer the matter to the Office of the Australian Information Commissioner:

Mail: GPO Box 5218, Sydney,
Online: www.oaic.gov.au/privacy
Phone: 1300 363 992
Email: enquiries@oaic.gov.au

Changes to this Privacy Policy

Salveo Healthcare reviews this Privacy Policy frequently to keep it up to date with laws, technology and industry changes. We recommend that you visit our website regularly to keep up to date with any changes. An up-to-date copy of the policy can be viewed or downloaded from www.salveohealth.com.au.

We will let you know about any material changes to our privacy policy by emailing you at the email address provided by you to us (if any). Your continued use of our services indicates that you accept those changes. Through this document we will always let you know the information we collect, how we use it, and the circumstances under which such information may be disclosed by us.

For more information on your privacy, you can visit www.oaic.gov.au

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Responsible Officer for next review: CEO, Salveo Healthcare