

# PRIVACY POLICY

ISSUE DATE: JUNE 2023



This privacy policy defines how MedHealth Pty Ltd and its various businesses (MedHealth) collect, hold, use and disclose your personal information. Our executive leadership team is committed to ensuring that we comply with the Privacy Act 1988 (Cth) (Privacy Act) and other applicable privacy and health records laws in relation to the management of personal information.

The MedHealth entities that are covered by this privacy policy are listed at the end of this document.

## PERSONAL AND SENSITIVE INFORMATION

Personal information is any information or opinion (recorded in any form) about a person, from which that person may be identified.

Special provisions apply to the collection of personal information which is sensitive information. This includes health information and information about a person's race, ethnic origin, political opinions, membership of political, professional or trade associations, religious or philosophical beliefs, sexual preferences, criminal history and biometric data.

In this privacy policy, unless otherwise stated, a reference to personal information includes sensitive information.

## INFORMATION WE COLLECT AND HOW WE COLLECT IT

The types of personal information we collect about you will depend on the activities and functions we are undertaking. We may collect the information directly from you or from other people or organisations with which we interact.

The types of personal information we may collect and hold includes the following:

- Names, email addresses, age, contact details, mail addresses, correspondence (including emails, facsimiles, text messages and postal mail), gender information, occupation details and work history, lifestyle activities, education and training information
- Depending on your interaction with us, MedHealth may also collect medical and health related information provided by individuals to MedHealth or to its service providers in acquiring, using or receiving MedHealth services or in interactions with MedHealth
- Financial information such as information provided when applying for MedHealth services and credit arrangements including, but limited to, credit card/banking details

- Information from health service providers, including private health insurance membership number
- Photographic identification
- Information from MedHealth websites including website registration, surveys, and information related to the behaviour or users for example, IP addresses (not server addresses), previous sites visited, type of browsers used, nature of electronic devices used, internet pages accessed, cookies and location information
- Information collected by MedHealth from internal systems, internet and social media sites including, but not limited to, Facebook, LinkedIn, Affinity and PeopleStreme information systems
- Data obtained from third parties including, but not limited to, research and marketing information available within the public domain and purchased on behalf of MedHealth
- Information collected from persons attending MedHealth conventions, seminars and functions
- Information collected from persons applying for or attending training courses conducted by MedHealth

## INFORMED CONSENT

MedHealth will collect and share your personal information in accordance with the requirements of the Privacy Act 1988. We will collect and share your health information after we obtain your informed consent, or as permitted under the Privacy Act 1988. Where required, we will obtain your consent at the commencement of our interactions with you, such as when we commence providing services to you.

If we will provide services to you, at our first meeting with you, we will inform you about the information we will collect and with whom it will be shared. You will be asked to sign a consent form to confirm your understanding and provide consent. Once completed, this form will be stored in your secure electronic file in our case management database.

## OUR PRIMARY PURPOSE FOR COLLECTING PERSONAL INFORMATION

MedHealth collects personal information for the following purposes:

- To contact you to provide information about, and to deliver, our services to you and/or the person or organisation that referred you to us, such as your employer or insurer
- To manage our business
- To access and obtain medical records and history from treating healthcare providers
- To engage healthcare providers to assist in the provision of our services and assess medical conditions and/or diagnoses
- To provide seminars, conventions and educational training and work trial placement services
- To collate data for research and statistical purposes
- To meet compliance requirements under the terms of deeds and contracts MedHealth enters and/or administers on behalf of statutory and legislative bodies and government departments
- To review, evaluate, develop and improve our services
- To meet our statutory and regulatory obligations
- To recruit personnel
- For other purposes required or authorised by or under law, including purposes for which you have provided your express or implied consent

## USE AND DISCLOSURE OF PERSONAL INFORMATION

MedHealth uses and discloses personal information for the purposes for which it was collected – that is, in accordance with details of the relevant primary purpose outlined above.

We may also use and disclose personal information for other purposes where the individual provides consent for a use or disclosure or where use or disclosure is required or authorised by or under an Australian law or court/tribunal order.

MedHealth may disclose your personal information to:

- The organisation who referred you to our services (such as your employer or insurer)
- Medical practitioners and / or allied health professionals engaged by us to provide services
- Your treating healthcare providers
- Our related bodies corporate
- Persons or organisations assisting MedHealth in carrying out our functions
- Parties involved in a prospective or actual transfer of our assets or business
- Other organisations engaged or contracted by MedHealth to assist us to carry out our functions and / or provide services. Such organisations may include: recruitment agencies, previous employers, credit agencies, state or federal police, state or federal government agencies or departments, or personal referrers

We may also disclose team member profiles (including, but not limited to, sensitive information regarding memberships of trade and professional associations) and general information to government agencies, insurers, lawyers and other third parties who deal with MedHealth as part of its delivery of services.

MedHealth may disclose personal information to overseas recipients when that disclosure is consistent with the purposes set out above. The countries associated with the overseas recipients are, potentially: India, Philippines, Vietnam, New Zealand, the United Kingdom and the United States of America.

## WHAT HAPPENS IF PERSONAL INFORMATION IS NOT PROVIDED?

If you do not provide us with accurate or complete personal information when requested, MedHealth may not be able to provide you with the relevant service or information you require.

## HOW WE PROTECT YOUR PERSONAL INFORMATION

We may store your personal information in hard copy or electronic format on controlled systems which are secured against unauthorised access. We safeguard your personal information via robust security measures, including (but not limited to):

- Use of strong passwords and multifactor authentication on phones and computers;
- Mobile phones, laptops and files to be kept with staff or in a safe place;
- All data servers are hosted in secure data centres;
- Regular security testing of our IT systems, to ensure all systems meet the high of IT security.

MedHealth's IT environment has been established to meet the international standards for Information Security (ISO/IEC27001) and designed to meet the ASD Essential Eight mitigation strategies and Australian Government Information Security Manual requirements. All MedHealth Servers are located in secure data centres hosted inside Australia with Encryption at rest for all sensitive data.

We will appropriately destroy, erase or de-identify any personal information that is no longer required for any purpose described in this privacy policy or under any applicable laws and do not keep personal and health information longer than necessary.

## USE OF OUR WEBSITE AND PRIVACY

When you use our website, MedHealth may collect the personal information that you have provided.

We use network tools to identify your web browser, this may include the use of cookies and other technologies.

Cookies are used to assist in enhancing your browsing experience. Cookies do not reveal your email address, however we may record this if you transmit it to us electronically in an email message or through a web form.

MedHealth's website may contain links to other websites; this privacy policy has no application to any website.

## UPDATING OR CORRECTING YOUR PERSONAL INFORMATION

Your personal information needs to be up-to-date for us to perform our services. For this reason, it is important that the information we collect is accurate, complete and up-to-date.

We will endeavour to ask you during the course of our relationship with you to tell us of any changes to your personal information. You may request correction of your personal information by writing to our Privacy Officer.

We will take all reasonable steps to correct personal information to ensure it is accurate, up-to-date, complete, relevant and not misleading, either when the inaccuracy is identified by MedHealth or when the individual requests MedHealth to correct or update the information. If we correct the information, all relevant stakeholders will be advised of the correction and notice will be provided to the individual including reasons and available complaint mechanisms if the correction is refused.

## HOW YOU CAN ACCESS YOUR PERSONAL INFORMATION

You may access the personal information we hold about you by making a request in writing addressed to our Privacy Officer at [privacy@medhealthgroup.com.au](mailto:privacy@medhealthgroup.com.au) detailing the information you are requesting and providing sufficient proof of identity.

The Privacy Officer will confirm further details regarding associated costs, procedure and timeframes. We will typically respond to requests within 30 days, however there may be delays associated with the nature of the information requested.

We may also charge you a reasonable administration fee for provision of the information. If we withhold access in accordance with the Privacy Act, we will give you written reasons.

## DATA BREACH

MedHealth has policies and procedures in place for handling any suspected privacy breaches.

We will investigate suspected breaches to ensure that the cause is identified and corrective actions are implemented. Where applicable, we will notify affected individuals and the Office of the Australian Information Commissioner.

## PRIVACY COMPLAINTS AND FURTHER INFORMATION

If you have a concern or complaint about your privacy or you have any query about how we manage your personal information, please contact us using the details below.

If you are not satisfied with our response, you may also contact the Office of the Australian Information Commissioner.

## OUR CONTACT DETAILS

Our contact details are [privacy@medhealthgroup.com.au](mailto:privacy@medhealthgroup.com.au)

**MedHealth Pty Limited**  
**North Tower, Level 3, 485 La Trobe Street**  
**Melbourne, Victoria 3000**

## MEDHEALTH ENTITIES COVERED BY THIS POLICY

This privacy policy applies to all of the following entities and businesses that are owned by MedHealth Pty Limited:

- Ability Action Australia Pty Ltd
- Advicor Pty Ltd Limited
- ASSESS Medical Group Pty Ltd
- atWork Australia Pty Ltd
- Australian Medico-Legal Group Pty Ltd
- Benchmark OT Pty Ltd
- CaseWorks Australia Pty Ltd
- Cogent Advisory Pty Ltd
- Ipar Rehabilitation Pty Ltd
- Kairros Pty Ltd
- medEbridge Pty Ltd
- medEbridge Solutions Pty Ltd
- MedHealth Pty Limited
- Medico-Legal Opinions Pty Ltd
- Medilaw Victoria Pty Ltd
- Medilaw Pty Ltd
- mlcoa
- Next Health Pty Ltd
- Outcomes Connect Australia Pty Ltd
- SIS Rehab Group Pty Ltd
- Step 1 Group Pty Ltd
- The Work Focus Group Pty Ltd
- Total Workfit Solutions Pty Ltd
- UHG Pty Ltd
- Unified Healthcare Group Pty Ltd
- Work Health Group Pty Ltd
- WorkFocus Australia Pty Ltd