Privacy Policy - EXTERNAL

PURPOSE

Connected Wellness Pty Ltd trading as me&my wellness ("the company") recognises the importance of privacy and security of personal details of all our clients which are obtained as part of the standard procedure when a client engages the services of the company. The Privacy Policy document outlines ways in which personal and health information is handled by the company. This policy is an essential measure in delivering superior customer service and ensures appropriate infrastructure is in place to effectively manage privacy requirements.

The company is committed to following the guidelines and requirements of the Commonwealth <u>Privacy Act</u> 1988 and the <u>Australian Privacy Principles</u> as described in the <u>Privacy Amendment (Enhancing Privacy Protection)</u> Act 2012.

POLICY STATEMENT

Terminology

Throughout this policy:

Personal information means "personal information" as defined in the <u>Privacy Act</u>. This information may include details such as an individual's name, address, billing information, contact telephone number, email address or photograph. It also includes personal information collected to provide a health service.

Client means customer of me&my wellness's products and services.

Health information means information or an opinion about the health or disability (at any time) of an individual; or an individual's expressed wishes about the future provision of health services to themselves; or a health service provided, or to be provided, to an individual.

Products and services means any product or service, provided to a client in the normal course of the company's functions and activities.

This can be an activity performed in relation to an individual that is intended or claimed (expressly or otherwise) by the person performing it to:

- assess, record and maintain personal contact details for marketing of upcoming appointments or events to clients
- develop and continue our relationship with clients.

Approved Third Parties are other companies trading under the entity of Connected Wellness Pty Ltd or any institution with which we have entered into a Memorandum of Understanding (MOU). External service providers (including publishers and printers, government agencies, clinicians, suppliers, legal advisers (e.g. lawyers, investigators) and other similar service providers) are also included in this definition. The company must take reasonable steps to ensure that its approved third parties only handle personal information in accordance with the Australian Privacy Principles.

Opt-In means that by providing personal information to the company, the individual recognises the right that they have provided consent for the Company to make contact with them regarding company services.

Opt-Out is whereby the company commits to make the option freely available to unsubscribe at any time.

The Network means any healthcare practitioner who has entered into an agreement with the company who may supply services to any client of the company.

Company websites means www.meandmywellness.com.au.

Overview

The company's Privacy Policy seeks to:

- Ensure personal information is collected, stored and used in accordance with the Privacy Act 1988
- Acknowledge the responsibility of the company in ensuring that client information is protected
- Protect the privacy of clients by ensuring that only relevant personal information, which is necessary to provide products and services, is collected
- Ensure that all personal information collected, used or disclosed is accurate, complete and up-to-date
- Obtain consent to collect sensitive information
- Take reasonable steps to make an individual aware of
 - Why we are collecting information about them
 - Who else we might give it to; and
 - Other specified matters
- Destroy or permanently de-identify personal information if we no longer need it for any purpose for which we may use or disclose information
- Ensure privacy is protected by the use of an 'Opt-In' approach which permits the company to specifically utilise contact information for outlined and appropriate promotional contact. As such, in providing personal information to the company, it is deemed that the individual has 'Opted in' under the company's Privacy Policy. The company also commits to provide the individual with an 'Opt-Out' option at any time
- The company does collect statistical information which cannot be related to any specific individual for continuous improvement purposes and does not provide personal information to external parties for marketing purposes unless prior written consent has been granted by the client.

What information is collected and why

The company collects personal information deemed necessary for one or more of our functions or activities as a healthcare organization and will use all personal and health information collected strictly for the necessary function or activity for which the information was obtained. The types of personal information we generally collect includes your name, date of birth, address and other contact details such as your telephone numbers and email address. Depending upon the purpose of our interaction with you, we may collect additional personal information. More details about the personal information (including sensitive information) we collect and why is set out below.

As a client of the company, we collect personal information to record your involvement and to monitor your health progress. The information we collect from you will generally be sensitive health information and could be other sensitive information such as information about your racial or ethnic group.

We may collect your personal information including:

- your medical history, including where relevant a family medical history;
- your Medicare number and information about your private health insurance;
- current medications or treatments used by you;
- the name of any care provider, health service provider or medical specialist to whom we refer you back to, or has referred you to us, and copies of any referrals and reports;
- medical testing results

Information may also be collected about individuals who are not clients of the Company, for example when collecting emergency contact details or a family medical history.

Information will be collected from individuals during consultations, health assessments, online questionnaires, paper based questionnaires and other occasional sources. All information collected, either verbally or in paper or electronic format is subject to the company's confidentiality policy and is held in strict confidence by all participating and related professionals and staff members of the company.

Disclosure of information

Personal or health information will not be disclosed unless by individual consent, or if it is information which the individual can reasonably know will be disclosed to an agency under the Privacy Act 1988. Personal and health information will also be disclosed if it is required by law.

Client personal and health information will be shared by the network where required for treatment, and where consent has been granted by the client.

Information collected for contact and marketing purposes is subject to an "unsubscribe" option or an "optout" option.

Visitors to our website

We make use of "cookies", "pixel tags" and similar technologies on company websites. The use of cookies on company websites allows us to track usage patterns and to compile data in an aggregated and "non-user" specific form enabling us to improve our website for future visitors. If you elect to become an online community user of www.meandmywellness.com.au (for instance through signing up for our e-news) cookies are used to remember you and to track your usage of our website. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature.

The use of pixel tags on our Websites allows us to track traffic patterns on the Websites. They may also be used to determine the habits of our email recipients. For instance, if you sign up for our e-news, pixel tags may be used to determine whether those emails are viewed and what content in those emails is viewed. This information may be linked to your IP address.

The information obtained by us through the use of cookies, pixel tags and similar technologies may be used for marketing purposes in accordance with this privacy policy.

Data security

The company takes all reasonable steps to protect the personal and health information from unauthorized access, modification, disclosure, misuse or loss. The company operates an information technology environment with password protection. The company premises are secured and all employees sign confidentiality agreements. The company also has a separate security policy which all employees must uphold.

Will your personal information be sent overseas

The Company does not disclose your personal information to overseas recipients. We do however store some personal information on servers owned by companies based in the United States of America. Our contractual arrangements comply with the requirements of the Privacy Act and we take reasonable steps to ensure those companies do not breach Australian privacy laws in relation to your personal information.

Access and correction of your personal information

You may request to access the personal information that we hold about you using the contact details provided in the "How to contact us" section of the website. We will provide you with access, free of charge. If you are a client of the company you can also access your personal information by logging onto the Client Portal. In limited circumstances, access to your personal information may be declined in accordance with privacy laws.

We endeavour to ensure that your personal information is accurate, complete and up-to-date whenever we use it. You can assist us with this by letting us know if your details change or if you notice errors or discrepancies in information we hold about you. If you consider any personal information we hold about you is not accurate, or is incomplete or out-of-date, you may request we amend our records. Please note that it is generally not possible to make changes to clinical information, however, you may be entitled to request that we associate a statement with your record.

Complaints about the handling of your personal information

If you have any questions or concerns about this Privacy Policy or how your personal information has been handled by the company, please contact us using the details in the "How to contact us" section of the website or via email at info@meandmywellness.com.au.

We will consider and respond to your complaint within a reasonable period. If you are not satisfied with our response, or your consider that we may have breached the Australian Privacy Principles or the Privacy Act, you are entitled to make a complaint to the Office of the Australian Information Commissioner. The Office of the Australia Privacy Commissioner can be contacted by telephone on 1300 363 992 or full contact details can be found online at www.oaic.gov.au.

Queries

Any Privacy-related queries should be addressed to:

The Privacy Officer me&my wellness 74-76 Campbell St, Surry Hills NSW 2010

Email: info@meandmywellness.com.au

How are changes made to this privacy policy?

The company may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit www.meandmywellness.com.au regularly to keep up to date with any changes.

POLICY INFORMATION

Policy Name		Privacy Policy		
Administered by		Human Resources		
Version	Ref	Description of Amendments	Approved by	Date
1.1		Initial Policy	AH	15 Aug 16
1.2		Updated contact details	AH	15 May 20