Nurse4U Privacy Policy

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1. Your privacy is important to us

Nurse4U values and respects the privacy of this website's visitors and of anyone who contacts us. This website does not promote online surveys nor sends bulletins by email without authorisation of the recipients. Any personal data in any mail or email sent to us is solely used to provide information as requested. Personal details are maintained as required by the Privacy Act 1988 and the Privacy Amendment (Private Sector) Act 2000.

2. Purpose of this Policy

Nurse4U is required to make this policy freely available and in an appropriate form, and accordingly it is able to be accessed on our public website. Individuals who would like to request a copy of this policy in an alternate form, for example suitable for the vision impaired, or individuals from a non-English speaking background, may do so by contacting our Manager, and reasonable steps in the circumstances will be taken to provide the policy in an appropriate form.

This privacy policy explains the following:

- Our Commitments
- The scope of this policy
- Why we collect personal information
- What personal information we collect
- How we collect and use your personal information
- How we disclose your personal information
- Your right to access and/or correct your personal information
- How we protect your personal information
- Your right to make a privacy complaint
- How to contact us regarding privacy concerns

We reserve the right to review, and if necessary, change this Privacy Policy without notice. We will post changes to this Privacy Policy on our Website.

3. Our commitment to you

We respect and uphold your right to privacy protection under the Australian Privacy Principles in regulating how we collect, use, disclose and hold your personal information. We have policies and procedures to ensure that only authorised staff has access to your personal information and that it remains confidential and is only used for appropriate purposes and in accordance with this notice.

When you use our services or contact us in any way, you trust us with your personal information. We collect and store this information about you to help us deliver the best possible services. This document tells you about our privacy and confidentiality policy. The privacy and confidentiality policy says how we do what the law says we must do to protect your privacy. Privacy means that

any person has the right to have their personal information to not be told or shown to anyone. Confidentiality means that there is a duty to keep your personal information private and protected.

4. Scope

This Privacy Policy governs all personal information collected by and provided to us and must be adhered to by all persons who access, use, process, control or otherwise deal with personal information on our behalf. This policy applies to independent contractors and job applicants, as well as individuals who provide us with their personal information.

5. Why we collect your information

In order to provide care and services to you, we need to collect, store, use and disclose some sensitive information. We understand that it is important to you that we protect your privacy when we do this and we are committed to keeping your information safe and secure ensuring your privacy is maintained at all times. We collect your personal information due to the following reasons:

- It helps us to provide the right supports and services for you
- We can help you with complaints
- We can give you details about our activities
- We can get staff and pay them for their work
- So we can lawfully carry out supports and services to clients
- To help us review, manage and enhance our services
- To communicate with you, including via mail, email, phone or face-to-face
- When making job offers to applicants and prospective employees or for employment purposes
- To send you marketing or promotional information which you may be interested in. You may request not to receive these communications by contacting us. You may also wish to rejoin our marketing list, please contact us to find out how.
- To investigate complaints made about you, or made by you, or if we have reason to suspect you have breached any relevant policies or procedures
- As required or permitted by any law

Where we propose to use your personal information for a purpose other than as outlined above, we will seek your permission (unless we are required or permitted by law to do so without seeking consent).

6. What personal information we collect

We collect a variety of information depending on the level of service you require. We collect personal information that helps us contact you and provide services to you. We will only ask for, use or share sensitive information with your consent and only for the reason we collected it

(unless we need to by law). If you are giving us others' personal information, please do so only if they agree to this policy.

The personal information we keep might include: (but not limited to)

- your name, gender
- your date of birth
- your phone number, email address, home address
- your driver's license, or identification documents (as required)
- your insurance details
- your occupation, career history, references
- information about your disability.

Sometimes your personal information is sensitive information. Sensitive information is normally private and can include: (but not limited to)

- your cultural background
- your religious beliefs
- your sexual orientation
- information about your health.

We also keep personal information on:

- other service providers you receive services from
- your family or carers
- our staff.

We will collect more in-depth information depending on the type of care you are receiving and how this care is being funded. This information will include:

- Medical Presentation and Health History
- Religious and Cultural preferences
- Banking information such as credit card details and bank account details for direct debit and reimbursement purposes

We will not tell anyone about your personal information unless we have to by law. We also collect information that is not personal information, such as data relating to your activity on our Website. If you feel that the personal information that we are requesting at any point is not information that you wish to provide, please feel free to raise this with us.

7. How we collect, use and store your personal information

Generally speaking, we may collect personal information in the course of providing our products and services to you. We will collect your personal information directly from you unless it is

unreasonable or impracticable to do so, and will limit the personal information we collect to that which is reasonably necessary for our functions or activities.

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other sites. When you go to other websites from here, we advise you to be aware and read their privacy policy.

We usually collect personal information about our clients in the following ways:

- directly from the client and/or their representatives or next of kin
- from clients' health care providers and other persons/organisations who provide care and services to the client
- when you reach out to us via phone, email, mail or face-to-face
- enquiry form on our website

We usually collect personal information about our staff or potential staff members in the following ways:

- when you fill out and submit the job application form available on our website
- when you communicate with us via email, mail, social media or face-to-face
- For work-seekers, your personal image will be collected upon registration and stored. You will also be issued with a photo ID badge as a means of identifying you as an employee of Nurse4U when you attend Client facilities
- For referees: in the course of our checking work-seeker references with you and when we are checking information that we obtain from you about work-seekers
- ask to be on an email list such as our newsletter
- register as a site user to access facilities on our intranet
- when you submit your resume via email or via our website.

We may also collect personal information about you from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records, we will manage the information in accordance with the APPs and our Privacy Policy.

Where possible, we collect your personal information directly from you. In some circumstances we may obtain personal information from a third party.

For each visitor to our website, our web server collects the following type of information for statistical purposes:

- The number of users who visit the website
- The date and time of visits
- The number of pages viewed
- Traffic patterns

This is anonymous statistical data and no attempt will be made to identify users or their browsing activities. We use this data to evaluate our website performance and to improve the content we display to you.

We will not use your personal information for any purpose which is not related to the products or services we provide or for any purpose for which you would not reasonably expect us to use the information. Your information may be used by Nurse4U to enable us to offer you other products and services that will enhance our relationship with you. It is your decision whether you wish us to provide this service to you. We may release information about you where there is a duty to the public to disclose that information. However, we will not sell or disclose your information to any individual or entity outside Nurse4U, for marketing purposes.

Any sensitive information which we collect will only be used by us to help provide you with the care you need. We will not disclose or release this information without your consent, unless we are required to do so, such as an emergency situation. In this instance, we will make all attempts to contact your emergency contact person to gain consent to release your information to other health providers.

Additionally, we will not disclose your sensitive information without your consent, unless there is a need to disclose such information in accordance with the Privacy Act or to comply with any other regulatory requirement.

We will only use or disclose your personal information for the purposes of direct marketing if:

- we collected the information from you;
- it is reasonable in the circumstances to expect that we would use or disclose the information for direct marketing purposes;
- we provide you with a simple means to ‘opt-out’ of direct marketing communications from us; and
- you have not elected to ‘opt-out’ from receiving such direct marketing communications from us.

What happens if you choose not to provide your personal information?

You are not obliged to give us your personal information. If you would like to access any of our services on an anonymous basis or using a pseudonym, we will take reasonable steps to comply with your request. However, we will require you to identify yourself if:

- we are required by law to deal with individuals who have identified themselves; or
- it is impracticable for us to deal with you if you do not identify yourself or elect to use a pseudonym.

Where you provide us with personal information of another individual (for example, a referee), we request that you inform them that their personal information will be disclosed to us and the

purpose for doing so, and that they may contact us or review this Privacy Policy for further information.

We will take reasonable steps to protect your personal information from misuse, interference and loss as well as unauthorised access, modification or disclosure. For example, information stored on our computer network is protected by security features and procedures. We undertake regular monitoring of our practices and systems to ensure the effectiveness our security policies and identify and implement improvements where appropriate. We will endeavour to destroy or de-identify your personal information as soon as it is no longer required by us (where permitted by law).

We may keep your information in hard copy or electronic format. Hard copy versions are kept in secured lock and key places where only staff have access to. Any hard copy information is stored securely at our head office. We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access or disclosure.

When capturing customer data on our website it is passed through a secure server using encryption technology to ensure that your information is protected when being sent over the Internet. Additionally, all stored customer information is protected from unauthorised access through the use of secure passwords and usernames or other security procedures.

8. How we disclose your personal information

We will generally only disclose your personal information for the primary purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations. Circumstances where personal information may be disclosed broadly include compliance with statutory obligations, arranging for insurance, progressing insurance claims and meeting occupational health and safety obligations.

We may disclose your personal information to the following third parties (as applicable in the circumstances):

- certain contractors or subcontractors of ours that provide services to us (for example, mail processing businesses, printers, market research companies or other service providers). We generally ensure such organisations are contractually required to ensure that information we disclose is used only for the limited purposes for which we provide it
- references named in your application for employment or to join us

For the purposes referred to above in this Privacy Policy, you acknowledge and agree that we may disclose personal information and you consent to us disclosing such personal information to:

- our affiliated entities

- third parties engaged by us to perform functions or provide products or services on our or their behalf such as mail outs, marketing or advertising;
- third parties that sponsor or promote us;
- to administer employment arrangements, personnel development and management responsibilities;
- to meet our legal obligations such as the requirement to obtain criminal record checks for employees involved in providing care to our clients and workplace laws obligations;
- our professional advisors, including our accountants, auditors and lawyers;
- persons authorised by you to receive information held by us; and
- any persons as required or permitted by any law.

9. Your right to access and/or correct your personal information

If you need to change any details you have provided us, you can do so by contacting our Client Managers or our general Manager. If you would like a copy of your medical record, you may request this in writing from our Manager, you must provide a proof of identity in this case.

We may require you to comply with certain procedures before we allow access to or amendment of your personal information to ensure the integrity and security of information that we hold. Depending on the nature of your request, this may include completing a personal information request form or otherwise verifying your identity to our satisfaction.

We are not obliged to allow access to your personal information if:

- we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- giving access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between you and us and would not ordinarily be accessible by the discovery process in such proceedings;
- giving access would reveal our intentions in relation to negotiations with you in a way that would prejudice those negotiations;
- giving access would be unlawful;
- denying access is required or authorised by or under an Australian law or a court/tribunal order;
- we have reason to suspect that unlawful activity, or misconduct of a serious nature relating to our functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or

- giving access would reveal internal evaluative information in connection with a commercially sensitive decision-making process.

If you make a request for access to personal information, we will:

- respond to your request within a reasonable period; and
- if reasonable and practicable, give access to the information in the manner requested.

If we refuse to give access to the personal information because of an exception or in the manner requested by you, we will give you a written notice that sets out at a minimum:

- our reasons for the refusal (to the extent it is reasonable to do so); and
- the mechanisms available to complain about the refusal.

We reserve the right to charge you reasonable expenses for providing access to personal information, for example, a fee for photocopying any information requested by you. Nothing in this Privacy Policy replaces other informal or legal procedures by which you can be provided with access to personal information.

We will take reasonable steps to ensure that the personal information that we collect is accurate, up-to-date and complete and the personal information we use and disclose is accurate, up-to-date, complete and relevant. If we are satisfied that any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will amend our records accordingly.

Please notify us if your personal details change so that we may keep our records current.

10. How we protect your personal information

You should be aware that there are inherent risks associated with the transmission of information via the Internet. If you are submitting personal details, credit card numbers or other information over the Internet, please be aware that, while all reasonable efforts are made to secure information transmitted to this website, there is a possibility that information you submit could be observed by a third party while in transit. By using this website, you acknowledge that you do not hold Nurse4U liable for any security breaches, viruses, or other malicious software that may infect your computer or any loss of data, revenue or otherwise that may occur.

We store your information securely in our office, and only our staff and businesses we work with can access it. We use physical, electronic and management processes to keep your information safe. For example:

- Access to your information is protected by strict user logins
- Our servers are locked away with multiple physical safeguards
- All our staff are trained in information security, and

- We limit access to your information according to the strict client confidentiality laws that apply to law firms.

If a data breach or suspected data breach occurs, we will undertake a prompt investigation, which will include an assessment of whether the incident is likely to result in serious harm to any individuals. In such a situation we will comply with the requirements of the Act which may require notification to the Office of the Australian Information Commissioner (OAIC) and affected individuals. Please contact us if you have reason to believe or suspect that a data breach may have occurred, so that we can investigate and, if necessary, undertake appropriate containment, risk mitigation and notification activities as required.

11. Your right to make a privacy complaint

We will take reasonable steps to:

- ensure that the personal information that we collect is accurate, up to date and complete;
- ensure that the personal information that we hold, use or disclose is, with regard to the relevant purpose, accurate, up to date, complete and relevant; and
- secure your personal information while it is being held by us.

We will take reasonable steps to protect personal information from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

Electronic information is protected by various security measures (including encryption and password protection) and physical paper files are stored in a secure location. Personal information is de-identified where appropriate. Data protection includes the use of password access areas and secure servers.

You acknowledge that the security of communications sent by electronic means or by post cannot be guaranteed. We cannot accept responsibility for misuse, loss or unauthorised access to your personal information where the security of information is not within our control. If you suspect any misuse or loss of your personal information please contact us immediately.

We will take reasonable steps to destroy or de-identify any personal information held by us if we no longer need to hold the information for the purpose it was collected and we are not otherwise required by law to retain the information.

If you feel we have breached your privacy in any way you can lodge a complaint with our Governance team. This can be via phone, postal mail or email. We will contact you within 24hrs or the next business day if you made the complaint on the weekend. If we are unable to resolve the complaint in the first instance, we will write to you acknowledging your complaint and the issues you have raised. If you have a complaint about how we collect, use, disclose, manage or

protect your personal information, or otherwise consider there may be a breach of the Privacy Act or the APPs, please contact us in writing. We treat all complaints seriously and intend to resolve your complaint within a reasonable timeframe, usually 14 days or otherwise as soon as practicable. However, in some complex cases, resolution may take longer.

Once the complaint has been received, we will try to resolve the matter in a number of ways:

- Request for further information: We may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution. All details provided will be kept confidential.
- Discuss options: We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Manager.
- Investigation: Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
- Conduct of our employees: If your complaint involves the conduct of our employees, we will raise the matter with the employees concerned and seek their comment and input in the resolution of the complaint.

You are free to lodge a complaint directly with the Office of the Australian Information Commissioner (OAIC) online, by mail, fax or email. For more information please visit the OAIC website at http://www.oaic.gov.au/privacy/making-a-privacy-complaint.

12. How to contact us

Please forward all correspondence in respect of this Privacy Policy to the Manager, Prachi Shah who can be contacted by mail, telephone or email as follows:

Mail: 3B Tawny Court, Truganina, VIC 3029

P: 0490 043 834

E: Prachi@Nurse4U.com.au