

PracticeProfiles Privacy Policy – V4.20 – January 2022

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1. Who are we?

Practice Profiles Pty Ltd ABN 80 045 773 905 (**PracticeProfiles** or **we**) provides data analytics and reporting services, products and programs designed to assist medical practices and others in the healthcare industry to improve their services and obtain valuable market insights for their business purposes (**our Services**).

2. Purpose of this Policy, and updates to it

PracticeProfiles takes your privacy seriously and is committed to respecting your privacy and protecting your personal information. In handling personal information, we comply with the Australian Privacy Principles in the *Privacy Act 1988* (Cth) and other Australian laws relating to the handling of personal information (**Privacy Laws**).

This Privacy Policy outlines, among other things:

- The types of personal information we collect or receive about you
- Why and how we collect or receive it
- What we use it for
- How we store it
- With whom we may share it (and whether we send it offshore), and
- How you can access and update it, or complain about our handling of it.

Sometimes data we receive about you is provided to us by you, and sometimes by the organisation for which you work or that provides services to you (**Your Organisation**), in order to receive our Services. If you are not happy with this Privacy Policy, then please don't provide (and please advise Your Organisation not to provide) your personal information to us. Otherwise, you consent to us collecting, using, processing, storing, disclosing and transferring your personal information in accordance with this policy.

We may change this policy at any time (to reflect changes in our business or the law), by posting the amended policy on our website at www.practiceprofiles.com.au or providing you with an updated copy via Your Organisation. When you or Your Organisation provides us with your personal information following such a change to this policy, you agree to the terms of any such revised policy. You should check our website regularly to ensure that you are aware of any such changes.

3. What is personal information?

Personal information is 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 is recorded in a material form or not.

4. What types of personal information do we collect and why?

4.1 Types of information

The types of personal information that we collect will vary depending on your relationship with us and our Services used by Your Organisation. It may include:

- your name
- your contact details like your telephone number, mail or email address
- answers to any security questions required for you to access secure portals in connection with use of our Services
- any other information you provide to us, including information in response to surveys agreed with Your Organisation
- any other personal information that we may need to assist you or Your Organisation in dealings with us for the purposes of delivering our Services, and
- if you are a practitioner and Your Organisation has given specific consent for this purpose, the clinical management of patients and their resulting outcomes.

Please note that we collect only the information that we need for the particular purpose for which we have obtained consent, and only hold it for as long as it remains necessary for that purpose. We also only disclose your personal information for that purpose, for directly related purposes you would expect, or for other purposes to which you specifically agree.

4.2 Information collected by our websites

- When you visit the PracticeProfiles website, our web server may request your browser to create a cookie on your computer. A cookie is a small piece of information sent by our server to your browser.

- Our cookies do not contain personal information about users. However, cookies can identify a user's browser. The cookies transferred by our website are used for such things as capturing information about a user's web browser, controlling a pop-up window or enabling login access to password protected areas of the website.
- Our analytics systems use cookies to gather information regarding visitor activity to our websites. This is not used to identify you as an individual but is collated into aggregate results or classifications.
- If you do not wish to receive any cookies, you may set your browser to refuse them; go to the browser's help menu for instructions. Please note that some features of the PracticeProfiles website may not work if cookies are disabled.

4.3 We may use your personal information to:

- provide our Services to Your Organisation (or the corporate group of which it is part);
- conduct evaluations of our products, materials, programs and services;
- invite you to participate in research or to inform you of any of our new programs;
- contact individuals for feedback on products, materials, programs and services; and
- assist us to perform our corporate and contractual obligations to you and Your Organisation (or the corporate group of which it is part).

If you do not provide your personal information to us, we may not be able to deliver certain aspects of our Services to Your Organisation.

4.4 Use for Data Analytics Services

- We do collect un-identified data from medical practices (including Your Organisation) to allow us to create reports that may (amongst other purposes): determine how effective a practice is at managing patients in line with clinical guidelines; determine the patient health outcomes achieved by a practice; or, various other practice management metrics. Because this data is de-identified before it leaves the practice, these activities do not involve any collection or handling of personal information of patients.
- In the course of us reporting on such un-identified data that we collect, we may associate that data with the details of a particular medical practice. Again, no data arising from this association is personal information, except as set out directly below.
- If Your Organisation has given consent for us to collect your identity as a practitioner, we may do so, but only ever under the following conditions:
 - Your Organisation has first obtained your consent to such collection by us, for the specific purpose of such collection – which it will usually have done in your employment or contractor engagement terms;
 - we act as contractors to Your Organisation and deliver back metrics to a practitioner-level only to the benefit of that practice (or the corporate group of which it forms part); and
 - we never share your identity with any third-party to Your Organisation (or the corporate group of which it forms part).

5. Who do we collect personal information from?

- PracticeProfiles may collect personal information about you, directly from you or from Your Organisation (in which case, we rely on Your Organisation to have obtained your consent for that purpose).
- We primarily collect information about you when Your Organisation uses or requests to use our Services, or when you communicate with us by email, telephone, in writing or in person.
- We also collect information about you if you are, or Your Organisation is, providing services to us or if you apply for employment with us.

6. How do we store personal information?

PracticeProfiles holds personal information in electronic and in hard copy form.

We maintain the confidentiality and security of personal information by restricting access to only those of our staff with a legitimate need to access it. We will also take all commercially reasonable and appropriate steps to ensure your personal information is protected from risks such as loss, unauthorised access or use, destruction, modification or disclosure.

We store electronic data on Microsoft Azure (using the security features afforded by Azure, including ISO 27001 accreditation). We only permit our authorised personnel to access your personal information. To ensure (to the extent possible) your security where personal data is transmitted online, we use SSL (Secure Socket Layer) technology.

7. Who do we disclose personal information to?

7.1 Disclosure to third parties

As referred to above, for security purposes, all data that we collect is hosted on Microsoft Azure. PracticeProfiles will then only disclose your personal information to any third party (other than Your Organisation and the corporate group of which it forms part) with your prior consent.

We do not supply, sell or rent the personal information we collect to other third parties for any purpose, including the purpose of marketing those third parties' products or services.

7.2 Where disclosure is required or authorised by law

PracticeProfiles may disclose personal information to the extent it is required to do so by law.

8. Transfer of data offshore

All personal information collected by us is stored and processed in Australia. We do not transfer any personal information offshore.

9. Access and correction

- If you require access to or correction/updating of personal information we hold about you, please contact us using the details in section 11 below.
- We'll comply with your request within a reasonable time, unless an exception applies under the Privacy Laws - e.g., if doing so would unreasonably impact the privacy of others, would provide access to information generated through a commercially sensitive decision-making process, would prejudice our negotiations, would pose a threat to individual or public health and safety, or would otherwise be unlawful. If such an exception applies, we'll notify you of our reasons for withholding your information and advise how you can complain about that.
- When you make such a request, PracticeProfiles will ask you to verify your identity and to specify what information you require. We may ask the reason for your request so we can assist you most effectively. However, you are under no obligation to provide a reason if you do not wish to do so.
- We may charge you reasonable costs of providing you with access to your personal information we hold - but will not charge you for making the request or to correct/update your personal information. If we no longer need to hold that information, we'll remove it from our system and take reasonable steps to destroy all record of it.
- If you request that we correct information held by us that you consider is not accurate, complete or up-to-date and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We will do so unless there is a valid reason not to.
- Any person receiving direct marketing from us can request that no further direct marketing be sent, by contacting us on the contact details set out in section 11 below, to unsubscribe from our products, services or communications.

10. Complaints

- If you believe that there has been a breach or potential breach of this Privacy Policy or the Privacy Laws, please contact PracticeProfiles by phone, email or mail immediately at the details set out in section 11 of this policy and ask for your complaint or concern to be directed to the Privacy Officer.
- We take breaches seriously and have procedures to help identify and resolve a breach, potential breach or complaint as quickly as possible. This includes appropriate escalation processes to our Managing Director and notification processes in the event of a breach.
- Every complaint is forwarded by the staff member who receives it to the Privacy Officer.

- You will be notified of the process for dealing with the breach or potential breach. Your complaint will be thoroughly investigated, and a response provided within 30 days.
- If you are not satisfied with the resolution of your complaint you may contact the Office of the Australian Information Commissioner at its website www.oaic.gov.au or by telephone on 1300 363 992.

11. Contact Us

Contact us for enquiries or feedback about this policy, or for complaints about our handling of personal information, by:

- email: info@practiceprofiles.com.au
- phone: 1800 772 776
- mail: PracticeProfiles Privacy Officer
PracticeProfiles
PO Box 6223
SOUTH YARRA VIC 3141

12. Further Information

For more information about privacy and protecting your privacy, visit the Office of the Australian Information Commissioner website at <http://www.oaic.gov.au/>.