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1 Policy

The Companies Privacy Policy (External Clients) explains to the Client the manner in which personal information is collected, used and stored by the Company, in relation to the legislative requirements outlined in the Privacy Act 1988 (Cth)

2 Commencement

This policy is effective from 11 December 2018 and replaces any other policies or procedures regarding Privacy (External Clients).

3 Scope

This policy outlines how the Company holds, uses and discloses personal information as required by the Australian Privacy Principles contained in the *Privacy Act 1988 (Cth) (Privacy Act)*. This Policy has been created with reference to *Privacy Act 1988 (Cth)* and the *Australian Privacy Policy Guidelines* document published by the Office of the Australian Information Commissioner, current as of March 2018. This Policy is distinct from *P005: CHG Privacy Policy (Internal)*, that pertains to our collection of health and medical records, and is distinct from *TP001: RTO Privacy Policy* that pertains to learner enrolment and assessment information.

4 Definitions

Company The associated entities of Worcomp Pty Ltd, Corporate Health Group Pty Ltd and Corporate Health Group Defence Pty Ltd, trading as CHG, and collectively termed the Company in this document.

Client Is a reference to those persons or entities to whom the Company provides or intends to provide, services. It includes, but is not limited to patients, candidates, injured workers, employers, health promotion clients, CHG website visitors, regulatory body representatives and coworkers not employed directly by the Company.

Contractors A person or business who enters into a contract with the Company to provide services. A contractor is not an employee of the Company, but is bound by the terms of their contract with the Company.

CHG News An educational newsletter about Occupational Health and Return to Work topics, delivered monthly to the Client either electronically or in hard copy form.

Advisers A person or business who is not employed by the Company, and who provides advisory services to the Company.

Insurers A person or business who, through a contractual agreement, undertakes to compensate specifies losses, liability, or damage incurred by the Company.

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Cookie A cookie is a data file that a website transfers to your computer. This enables the website to track the pages you have visited. A cookie only contains information you supply. It cannot read data on your computer. There are many types of cookies that may be used for different purposes. For example, some cookies help a website to remember information about your visit, like your preferred language and other settings while others may identify which pages are being visited or offer security features. Our websites may use cookies. You can set your browser to refuse cookies, however, this may mean you are unable to take full advantage of our website.

5 Personal Information

5.1 Types

The Company will collect and hold personal information about the Client, Contractors, and other people who come into contact with the Company.

The kinds of personal information we may collect and hold may include your name, address, phone number, e-mail address, geographic location, and any other information you provide in response to interaction with our website, including Cookies, which may record which of our pages or other webpages you have visited.

5.2 Collection

The Company will generally collect personal information about the Client directly by way of online forms (on the Company website) and other documents or information submitted to the Company by the Client (whether in paper or electronic form), correspondence the Client provides to the Company, telephone calls or face to face discussions with the Client.

5.3 Usage

The Company will only use personal information for the following purposes unless otherwise required or permitted by law:

- To provide the Client with the best possible service in supplying goods and services offered by the Company;
- To answer any questions or inquiries the Client directs to the Company;
- To investigate and manage complaints or feedback by the Client;
- To provide the Client with marketing materials in relation to offers, specials, products and services the Company have available from time to time, provided the Client has been informed and has given consent to 'opt-in' to 'CHG News' , or other form of marketing material produced by the Company;
- To collect data in a de-identified format, for the purpose of analysing the Company services usage and population trends, in order to improve the provision of services by the Company to the Client. The Company will perform an appropriate level of de-identification that is consistent with the Australian Privacy Principles;
- For our internal management purposes, to manage our relationship with the Client, and to manage the payment or recovery of amounts payable to the Company by the Client or any entity related to the Client (as applicable); and

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- For other purposes which are reasonably necessary in connection with the normal functions and activities of the Company.

If the Company is unable to collect personal information relating to the Client, the Company may be unable to provide the Client with the goods or services required, or continue a relationship.

5.4 Disclosure

The Company may disclose personal information to the following kinds of entities for the relevant purposes mentioned above:

- Contractors, Advisers and Insurers working with the Company;
- any industry body, tribunal, court or otherwise in connection with any complaint made by the Client about the Company, and requested with the relevant release authority;
- if the Client has provided the Company with referees to assist with the assessment of a potential contract between the Client and the Company, the referees the Client have provided; and
- other entities with consent of the Client, or as permitted or required by law.

The Company may disclose the kinds of personal information listed above to overseas recipients. As at the date of this policy the recipients will be located only in Australia, although the countries in which the recipients are located may change over time.

5.5 Storage

The Company holds personal information in paper form and electronic form. The Company has in place security steps to protect the personal information held from misuse, interference and loss and from unauthorised access, modification or disclosure.

5.6 Access

The Client may obtain access to the personal information held by the Company, by contacting the Company using the contact details set out in the *Feedback* section. When the Client requests copies of personal information, the Company will provide such personal information as soon as reasonably practicable.

The Company may require the Client to verify identity and specify what information is required. There may be occasions when access to personal information the Company holds, is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others.

5.7 Accuracy and Completeness of Information

While the Company endeavours to ensure that the personal information collected from the Client is up to date, accurate and complete, the Company will assume that any personal information provided by the Client is free from errors and omissions. The Client may request that the Company update or vary personal information that is held about the Client using the contact details in the *Feedback* section below.

6 Direct Marketing Communications

From time to time the Company may use the personal information of the Client to provide marketing materials in relation to offers, specials, products and services that are available. If the Company intends

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to do this, the Client will be informed of the context of the request and ask for explicit consent to 'Opt-In' to this form of marketing communication from the Company.

7 Consent

When the Company asks for the consent of the Client, the Company will ensure that reasonable and adequate explanation for the implications of consent is provided to the Client. This ensures the Client is provided informed consent to requests by the Company.

8 Complaints About a Breach of Your Privacy Rights

If the Client is of the view that the Company has breached the *Australian Privacy Principles*, the *Privacy Act*, or any related privacy code in dealing with their personal information, the Client may make a complaint in writing to the Company using the contact details in the *Feedback* section below. The Company will respond and provide the Client with confirmation as to how the Company proposes to deal with the complaint as soon as reasonably practicable.

If the Client is not satisfied with the Company's response to the complaint, the Client may make a complaint to the Office of the Australian Information Commissioner.

9 Anonymity and Pseudonyms

The Client has the option to not identify themselves and/or use a pseudonym when dealing with the Company, except during the following two circumstances:

- A law or court/tribunal order requires that the Client be identified; or
- It is impractical for The Company to deal with the Client in an unidentified or pseudonym form.

In these two circumstances, the Company will require the Client to identify themselves before engagement between the Company and the Client can continue.

10 Responsibilities

If the Client suspects a breach in this policy, it is the Clients responsibility to notify the Company of the suspected breach. Likewise, if the Company suspects a breach has occurred the Company has the responsibility to notify the affected Client of the suspected breach.

It is the responsibility of the *CHG Privacy Officer* to investigate all suspected cases of breach or complaints against the use of this policy.

11 Related Documents

- P005: Privacy Policy (Internal)
- TP001: RTO Privacy Policy
- Privacy Act 1988 (Cth) (Privacy Act)
- Australian Privacy Principles
- Australian Privacy Policy Guidelines

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- Or any related privacy code in dealing with your personal information

12 Feedback

The Company is committed to continuous improvement, and as such all Policies are refreshed annually. Additionally any specific policies will be updated throughout the year as required.

Your thoughts, comments and suggestions are welcome. Please direct any feedback to the CHG Privacy Officer via bookings@chg.net.au or call 08 8354 9800.

13 Variations

The CHG Privacy Officer reserve the right to vary, replace or terminate this policy from time to time.

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