

## OneVault Enterprises Pty Ltd Privacy Policy

This Privacy Policy (**Policy**) sets out in accordance with the *Privacy Act 1988* (Cth) the way in which OneVault Enterprises Pty Ltd and its related entities (**OneVault, we, us, or our**) may collect, store, use, disclose, manage and protect Personal Information (including Sensitive Information) in the course of its business operations.

OneVault provides services via an online platform (**Platform**) to assist organisations with clinical governance, compliance and accreditation. These services are offered through a variety of modules including (but not limited to) Guide, Quality, Audit, Risk, Learning, Safety, Feedback, Incident, Clinical Indicators, Mortality, Action Planner, News Portal, Accreditation Manager, Board Report, Training Manager, CPD and Quality Projects (**Services**).

In operating the Platform and providing the Services, OneVault may collect information about our customers (including the Personal Information of their officers, agents and employees), as well as information uploaded by our customers into the Platform (which may contain the Personal Information of third parties).

By:

- (a) accessing and/or using the Platform or Services ;
- (b) providing Personal Information to a OneVault customer who has informed you of the fact that your Personal Information may be shared with OneVault;
- (c) accessing, requesting information on, enquiring about, using, receiving or providing feedback in relation to, OneVault's operations or Services (online, in writing, by telephone or in person);
- (d) seeking employment with us; or
- (e) otherwise providing, or consenting to the collection of, Personal Information by OneVault, its officers, agents or employees.

after this Policy has been brought to your attention, you acknowledge and consent to the use, collection, storage or disclosure of your Personal Information by us in accordance with this Policy and the *Privacy Act*.

If you **do not** agree to us handling your Personal Information in the manner set out in this Policy we will not be able to provide our Services to you or our customers, and you should not provide us with any Personal Information.

Our Data Breach Policy forms part of this Privacy Policy and sets out our approach to any data breach.

### 1. What is Personal Information?

We follow the definition of Personal Information given in the *Privacy Act*:

*Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:*

- (a) *whether the information or opinion is true or not; and*

- (b) *whether the information or opinion is recorded in a material form or not.*

## 2. **What kinds of Personal Information might we collect and hold?**

We may collect (and hold) different Personal Information about you depending upon how you interact with us. This information may vary depending on the specific needs of you, and of OneVault, however, it may include your:

- (a) *name, address, email address and telephone number and contact information;*
- (b) *occupation, employment history and educational qualifications;*
- (c) *history of interaction with our customers, including what services you access or accessed, frequency of access, and any problems or issues that arose in your interactions with our clients;*
- (d) *demographic information such as age or date of birth, location and activities;*
- (e) *health information;*
- (f) *Sensitive Information (as that term is defined in the Privacy Act 1988 (Cth));*
- (g) *history with us;*
- (h) *identification details (including your universal record number);*
- (i) *messages, emails, voicemail and other correspondence and frequency of enquiries;*
- (j) *comments and feedback and responses to surveys;*
- (k) *interaction with websites, including our website and the Platform;*
- (l) *what computer configurations and software you use;*
- (m) *general preferences;*
- (n) *government issued identifiers such as Australian Government concession and health care card identifiers (and numbers) and Medicare Numbers as well as driver's licence, passport and/or visa details, police check and security clearance details;*
- (o) *billing and credit card information; and*
- (p) *any additional information relating to you that you provide to us directly.*

For the purpose of paragraph 2(e) '**health information**' means information, data or opinions about:

- i. *your health or a disability (at any time);*
- ii. *clinical notes, medical records or correspondence about your health;*
- iii. *your expressed wishes about the future provision of health services or Services to you;*
- iv. *a health service or Services provided, or to be provided, to you;*

- v. pathology results;
- vi. radiology imaging;
- vii. facility/venue where health services or Services were provided to you;
- viii. a diagnosis, care arrangements, care plans, observations, medications;
- ix. notes of your symptoms or diagnosis and the treatment given to you;
- x. your specialist reports and test results;
- xi. your appointment and billing details;
- xii. your genetic information;
- xiii. your healthcare identifier;
- xiv. any other information about your race, sexuality or religion; and
- xv. other personal information collected to provide, or in providing, a health service or Services to you.

For the purpose of paragraph 2(f) '**sensitive information**' includes information about:

- i. health (including predictive genetic information);
- ii. racial or ethnic origin;
- iii. political opinions;
- iv. membership of a political association, professional or trade association or trade union;
- v. religious beliefs or affiliations;
- vi. philosophical beliefs;
- vii. sexual orientation or practices;
- viii. criminal record;
- ix. biometric information that is to be used for certain purposes;
- x. biometric templates.

If you apply for employment with us your personal information may be disclosed to recruitment agencies for suitability assessment.

Health information, information about your race, gender, sexuality or political opinions and affiliations are a special type of Personal Information under the Privacy Act called 'Sensitive Information'. You have additional rights in relation to Sensitive Information.

### **3. How do we collect Personal Information**

We collect Personal Information:

- (a) directly from you (when you provide that information to us, we contact you, when you contact us, when you use our Services, when you engage with us or when we engage with you);
- (b) when you provide that information to one of our customers (and they obtain your consent to upload that information onto the Platform);
- (c) when providing our Services;
- (d) from third parties who you have authorised to provide us with information; and
- (e) from publicly available sources.

### **4. How do we hold and secure your Personal Information?**

We store your Personal Information both in hard copy format and digitally. All hard copy material is secured onsite.

All digital material is secured using password protected computers.

We process payments using Stripe. All online payments via this gateway are processed using 128 bit security, and are not visible to OneVault.

Records are kept for as long as they have value and in line with any legal requirements for the storage of information. If you delete your account due to you discontinuing a subscription, your data will be deleted from our backups after three months.

OneVault uses data storage providers located inside Australia. OneVault has agreements with its storage providers to keep all Personal Information they store secure, using reasonable and appropriate security methods.

We conduct regular audits of our compliance with this Policy and the Act to ensure that our privacy framework is in line with industry best-practice.

### **5. Why do we collect, hold, use and disclose Personal Information?**

OneVault may collect Personal Information for a number of reasons, including:

- (a) providing our clients with a centralised record of the documents required for accreditation and compliance for their operations;
- (b) providing you or a third party with Services;
- (c) providing you with information about our Services, events or developments;
- (d) sending communications you request or contacting you and responding to your enquiries;
- (e) providing third parties with information about you and your use of our Services where necessary or appropriate;
- (f) ensuring consistency of service across our organisation and other internal organisation purposes;

- (g) developing or refining our Services;
- (h) internal organisation purposes;
- (i) providing you with marketing material;
- (j) contacting you in relation to your access to and use of our Services;
- (k) better understanding our clients and other stakeholders;
- (l) tailoring our Services; and
- (m) corporate governance, auditing and record keeping.

Our use of Personal Information may extend beyond these uses, but will be restricted to purposes that we consider to be related to our functions and activities.

## **6. What do we do with your Personal Information?**

If we collect Personal Information, we may:

- (a) use that information for the purposes stated in this Policy;
- (b) store that information in accordance with this Policy;
- (c) pass that information amongst entities we work with and to our customers;
- (d) pass that information to third parties who provide products or services to us (including our accountants, auditors, lawyers, IT contractors, and other service providers);
- (e) provide that information to third parties as required or allowed by law.

## **7. Do you use my information for Direct Marketing?**

We may use your Personal Information to communicate directly with you to promote our Services. We use direct marketing to provide you with information about our Services that we believe you may be interested in. If you receive direct marketing material from us, and do not wish to continue receiving it, please contact us by any of the methods stated in this Policy, asking to be removed from all future direct marketing programs. Once we have received your opt-out request, we will remove you from our direct marketing programs as soon as reasonably practicable.

## **8. What about Cookies, pixels and analytics?**

When you access our website, we may receive information you via a 'cookie', a 'pixel' or from analytics software.

These are tools that our web server may direct your traffic to, send to your computer, or embed on a website, when you visit our website. These tools help us to recognise when you re-visit the website, serve you customised content and to optimize your experience. We generally don't collect Personal Information through the use of these tools, though we may be able to access your IP address and information about what your computer technology is when using analytical software.

You may be able to change the settings of your browser so that Cookies are not accepted generally or that you are provided with options to accept or reject them as they are sent to your browser.

**9. Do we ever send your information overseas?**

**We will not upload your images and/or footage to our social media accounts.**

**Can you access your Personal Information or request it be corrected?**

- (a) You may request access to the Personal Information that we hold about you by contacting us.
- (b) Upon receiving an access request we may request further details from you to verify your identity. We reserve the right not to provide you with access to Personal Information if we cannot verify your identity to our reasonable satisfaction.
- (c) An administrative fee may be charged to cover our costs in providing you with access to your Personal Information. This fee will be explained to you before it has been incurred.
- (d) We will respond to your access request within a reasonable period of time by:
  - (i) providing you with access to your Personal Information;
  - (ii) rejecting your access request, and providing you reasons for this rejection.
- (e) Access requests may be denied where:
  - (i) we believe your request is frivolous or vexatious;
  - (ii) we are entitled to reject a request by law;
  - (iii) we are unable to verify your identity; or
  - (iv) you have not paid the administrative fee (if any).
- (f) If you believe that the Personal Information that we hold is inaccurate or otherwise requires correction, you may send us a correction request by contacting us. We will review your Personal Information and respond to the request within a reasonable period of time.

**10. Sensitive Information**

We will only keep your Sensitive Information whilst you consent to us doing so, or if we are required to by law or to protect a legal right. If you want us to delete your Sensitive Information you may request we do so in writing.

**11. What happens if you want to deal with us anonymously or using a pseudonym?**

When contacting us, you can do so either anonymously or by using a pseudonym. If you do so, we may not be able to provide you with accurate or useful information, and you may not be able to access a full range of our operations and services. Further, we may not be able to investigate incidents or complaints you have made.

**12. Does this policy ever change?**

From time to time we may make changes to this Policy. When we do, we will highlight those changes in yellow highlight for a period of 14 days. Please make sure you review the Privacy Policy each time you visit our website to keep up to date on any changes.

### 13. **What about the General Data Protection Regulation (GDPR)?**

The GDPR is the European Union (**EU**) data protection law. Australian-based organisations that offer goods or services to persons in the EU or target or monitor the behaviour of persons in the EU may be required to comply with the GDPR regulatory regime.

We are an Australian based organisation providing products and services within Australia. From time to time, we may capture or collect Personal Information that passes through the EU. This might occur, for example, if a person in the EU accesses our website and we collect analytical data about them, if a person in the EU signs up for a newsletter, books services from the EU, or if one of our members gives us information about a person in the EU. If this occurs, we will treat the Personal Information received in accordance with this Policy.

Where data is processed or monitored in the EU, you may have additional rights, such as:

- (a) The right to request that we delete your Personal Information (unless we require that information to comply with a legal obligation, or need it to bring or defend a legal claim); and
- (b) The right to restrict our processing of your Personal Information (where it is inaccurate, would be unlawful to process, or where it has not been deleted due to us needing it to meet a legal obligation).

### 14. **What happens if you have a question or complaint about how we have handled your Personal Information?**

If you have a question or complaint, you can raise it with us by:

Emailing: [hello@onevault.net.au](mailto:hello@onevault.net.au)

Sending a letter to: Allied Health Building, Lot Fourteen, North Terrace, ADELAIDE SA 5000

We take all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous or vexatious or if we are unable to verify your identity. If you aren't satisfied with the way we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

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