

connector co

Privacy Policy

Leading change. Leading connection.

1. Scope

- 1.1. This Privacy Policy applies to the collection, storage, use, disclosure and handling of your Personal Information by **Connector Co Pty Ltd** (ACN 664 805 314) and its related bodies corporate (**Connector Co**) and sets out how to contact Connector Co if you have queries in relation to your personal information or would like access to it.
- 1.2. Connector Co is committed to protecting the privacy of your Personal Information. Connector Co abides by the Australian Privacy Principles as set out in the Privacy Act, the Health Privacy Principles as set out in the *Health Records and Information Privacy Act 2002* (NSW), and all other relevant privacy or personal data collection laws, codes and regulations.
- 1.3. In this Privacy Policy, the following words and expressions have these meanings unless the context otherwise requires:
 - (a) **Health Information** has the meaning given by the Privacy Act;
 - (b) **Individual** has the meaning given by the Privacy Act;
 - (c) **Participant** has the meaning given by the Terms of Use;
 - (d) **Personal Information** has the meaning given by the Privacy Act;
 - (e) **Platform** has the meaning given by the Terms of Use;
 - (f) **Privacy Act** means the *Privacy Act 1988* (Cth);
 - (g) **Provider** has the meaning given by the Terms of Use;
 - (h) **Sensitive Information** has the meaning given by the Privacy Act;
 - (i) **Terms of Use** means Connector Co's terms governing the use of the Platform as published on Connector Co's website and amended from time to time.
- 1.4. Compliance with Google API Services User Data Policy: Connector Co's use and transfer to any other app of information received from Google APIs will adhere to the Google API Services User Data Policy, including the Limited Use requirements. For more details, please visit the [Google API Services User Data Policy](#).

2. Background information

2.1. Connector Co provides the Platform. The Platform essentially connects Participants with Providers.

2.2. Connector Co may provide a range of services and functionalities that it offers through its website and associated mobile applications or through its customers' websites and mobile applications. These include:

- (a) creation and management of an online profile for Participants and Providers;
- (b) a booking system for appointments with Providers;
- (c) a communication portal for Providers to communicate with Participants about appointments and other important matters (such as reminders, recalls and other Provider notifications);
- (d) digital forms for completion by Participants ahead of their appointments with Providers;
- (e) payment processing facilities;
- (f) integrations enabling Providers to conduct online patient verification of the Participant's Medicare and Department of Veterans' Affairs details before an appointment.

3. Collection of Personal Information

3.1. Connector Co may collect your Personal Information from time to time in accordance with this Privacy Policy. Connector Co collects this Personal Information to provide the Platform and operate Connector Co's business. The reasons Connector Co collects and holds Personal Information include for example:

- (a) identifying an Individual before they access or use the Platform;
- (b) facilitating bookings and communications between Participants and Providers;
- (c) working and dealing with Individuals in the ordinary course of business.

3.2. The Personal Information collected may include:

- (a) general information such as your name, location, date of birth, gender, Medicare details, family details including marital status, contact information (including your email address, telephone number, and residential, business and postal addresses), your registration details for the Platform, and details of your use of or access to the Platform;
- (b) Health Information which under or in addition to the Privacy Act includes but is not limited to information about your health, the health services which have been or are to be provided to you, and any other services that have been or are to be provided to you;
- (c) Sensitive Information which under or in addition to the Privacy Act includes but is not limited to information which might relate to, among other things, your racial or ethnic origin, sexual orientation or practices, criminal record or religious or philosophical beliefs;
- (d) any other Personal Information you send or disclose to us, including our records of any communications or interactions we have with you.

4. When Connector Co collects Sensitive Information

4.1. Connector Co does not collect Sensitive Information except where:

- (a) you have consented to the collection of the information;
- (b) the collection is legally necessary or is authorised under an Australian law or by a court or tribunal, including where this is reasonably necessary to establish or defend a legal or equitable claim;
- (c) Connector Co believes that its collection is reasonably necessary (**permitted general situation**):
 - (i) to lessen or prevent a serious threat to the life, health or safety of any Individual, or to public health or safety, and it is unreasonable or impracticable to obtain the Individual's consent to the collection of the information;

- (ii) to take appropriate action in relation to unlawful activity or misconduct of a serious nature relating to Connector Co's functions or activity which Connector Co has reason to suspect has been, or is being, engaged in;
 - (iii) to assist any entity, body or person to locate a person who has been reported as missing; or
 - (iv) for the purposes of a confidential alternative dispute resolution process; or
- (d) the information is Health Information and its collection is necessary (**permitted health situation**):
- (i) for research relevant to public health or safety in circumstances whereby obtaining the Individual's consent is impracticable and Connector Co reasonably believes that the recipient will not disclose the information;
 - (ii) in the case of genetic information obtained in the course of providing a health service, to lessen or prevent a serious threat to the life, health or safety of a genetic relative of the Individual, where the recipient of the information disclosed is a genetic relative of the Individual; or
 - (iii) to provide appropriate care or treatment of the Individual, or for compassionate reasons, in circumstances where the Individual is physically or legally incapable of giving consent to the disclosure, or physically cannot communicate consent to the disclosure, the recipient of the information is a responsible person for the Individual, and the disclosure is not contrary to any wish previously expressed by the Individual.

5. When Connector Co does not collect Personal Information

- 5.1. Connector Co does not collect Personal Information from an Individual unless the information is reasonably necessary for or is directly related to one or more of Connector Co's functions or activities.

6. How Connector Co holds Personal Information

- 6.1. Connector Co may hold Personal Information in a number of ways, including electronically on its onsite computer databases.
- 6.2. Connector Co has taken a number of steps to protect Personal Information from misuse, unauthorised access, disclosure, modification or loss.
- 6.3. Connector Co uses accepted technology and security so that it is satisfied that Personal Information is transmitted safely to it through the internet or other electronic means.

7. Use of Personal Information by Connector Co

- 7.1. The primary purposes for which Connector Co collects Personal Information are to facilitate the Platform, the provisions of services to you by the Provider, and operate Connector Co's business.
- 7.2. Connector Co uses your Personal Information (including your Health Information and other Sensitive Information) for the primary purpose for which Connector Co collected it.
- 7.3. Connector Co only uses Personal Information for secondary purposes if you consent to this or if you reasonably expect Connector Co to do this, including where relevant providing your Personal Information to Providers you have made a booking with on the Platform.
- 7.4. Connector Co maintains all Personal Information in strict confidence, and only discloses it to third parties:
 - (a) to enable provision of the Platform and services to you;
 - (b) to enable Providers to keep accurate records, communicate with you and verify your identity;
 - (c) to provide certain services to you or facilitate payment for an appointment booked through the Platform; or
 - (d) if otherwise authorised or required to do so to comply with relevant laws such as where you:

- (i) you have provided express consent;
- (ii) it is reasonably necessary in taking action in relation to suspected unlawful activity, serious misconduct, locating a missing person or as is required or authorised under law or court or tribunal order; or
- (iii) it is reasonably necessary to assist in lessening or preventing a serious threat to life, health or safety of any individual, or to public health.

7.5. The types of third parties that Connector Co may generally disclose your Personal Information to for the above purposes include:

- (a) the Provider that you have previously had, or intend to book, an appointment with or otherwise communicate or interact with through the Platform; and
- (b) our service providers who support and enable us to provide our services and operate our business, such as:
 - (i) our information technology, network, software and cloud storage providers, including support service and messaging, email or push notification services providers;
 - (ii) any practice management software providers which the Provider uses, to enable the Provider to communicate or interact through the Platform;
 - (iii) payment providers to ensure that financial information is kept safe; and
 - (iv) external professional advisors (such as Connector Co's lawyers).

8. When Connector Co does not use or disclose Personal Information

8.1. The use or disclosure of an Individual's Personal Information will only be for the purpose for which it was collected or for related secondary purpose (a purpose other than the primary purpose but is related to the primary purpose) unless:

- (a) Connector Co is under a legal duty or obligation to disclose Personal Information about the Individual, or Connector Co is otherwise compelled to disclose such information by an Australian law, or by order of a court or tribunal;
- (b) the Individual has consented to its use or disclosure;
- (c) the Individual would reasonably expect Connector Co to use or disclose the Personal Information for the secondary purpose and the secondary purpose is directly related to the primary purpose (Sensitive Information) or related to the primary purpose (information other than Sensitive Information);
- (d) one of the circumstances identified at clause 7 arises; or
- (e) Connector Co reasonably believes that the use or disclosure of the information is reasonably necessary for enforcement related activities conducted by or on behalf of Connector Co.

9. Overseas recipients

9.1. Connector Co may disclose your Personal Information to overseas recipients. It is not reasonably practical to list all the countries in which the recipients of your information are likely to be located and you consent to this disclosure. In providing this consent, you understand that the overseas recipient may not be accountable under the Privacy Act and you may not seek redress under the Privacy Act. The overseas recipient may not be subject to similar obligations as the Australian Privacy Principles. You must contact Connector Co's privacy officer if you do not consent to your information being disclosed to overseas recipients.

10. Personal Information of Individuals to be kept up-to-date

10.1. Connector Co takes all reasonable precautions to ensure that the Personal Information it collects, uses and discloses is accurate, complete and up-to-date.

11. Requests for access to Personal Information

11.1. An Individual is entitled to access any Personal Information that Connector Co holds about them, unless:

- (a) Connector Co reasonably believes that giving access would pose a serious threat to the life, health or safety of any Individual;
- (b) giving access would unreasonably impact the privacy of others;
- (c) the request for access is frivolous or vexatious;
- (d) the information relates to existing legal proceedings between Connector Co and the Individual, and would not be discoverable in those proceedings;
- (e) giving access would reveal Connector Co's intentions in negotiations with the Individual and prejudice those negotiations;
- (f) access would be unlawful;
- (g) denying access is required or authorised by an Australian law or court or tribunal order;
- (h) Connector Co has reason to suspect that unlawful activity or serious misconduct relating to its activities has been or is being engaged in, and giving access would prejudice its action in relation to this activity or misconduct;
- (i) giving access would be likely to prejudice enforcement related activities being conducted by an enforcement body; or
- (j) giving access would reveal evaluative information generated within Connector Co in connection with a commercially sensitive decision-making process.

11.2. All requests for access to Personal Information should be addressed to the Privacy Officer in writing.

11.3. Requests for access will be responded to as soon as practicable, and any refusal for access must be supported by reasons and applicable exceptions under the Privacy Act.

11.4. An Individual may request the correction of Personal Information which relates to them. Connector Co will take reasonable steps to correct the information as soon as practicable.

12. How to make a complaint about privacy

- 12.1. Connector Co will promptly acknowledge and investigate any complaints about the way it manages Personal Information.
- 12.2. Any complaints with respect to Connector Co's compliance with the Australian Privacy Principles should be addressed to the Privacy Officer in writing.
- 12.3. For the avoidance of doubt, the identity of a complainant will not be disclosed by the Privacy Officer unless otherwise decided between the Privacy Officer and complainant.

13. Contact details

- 13.1. If you have any queries about this Privacy Policy, wish to gain access to Personal Information that Connector Co may hold about you or would like to make a privacy compliant, contact:

Street address: Gladesville NSW 2111

Email address: info@connectorco.com.au

Telephone number: 0421 869 995