



WORK HEALTH GROUP

Privacy Policy

The Work Health Group (WHG) is committed to complying with its obligations under the Privacy Act 1988 and the associated Australian Privacy Principles (APPs). This Policy applies to all WHG brands including:



Application of the APPs to WHG

WHG is bound by the APPs.

WHG will not collect personal information unless it is reasonably necessary for, or directly related to, one or more of its functions or activities.

WHG's contact point is as follows:

Email: privacy@workhealthgroup.com.au
 Telephone: (03) 8660 0888

WHG, through its Privacy Officer, is happy to provide further details as to the extent to which it is required to comply with the APPs. Alternatively, further details of the obligations imposed upon organisations under Australia's privacy laws can be obtained directly from the Office of the Australian Information Commissioner (Commissioner) or by reference to the APPs and the Commissioner's associated guidelines at www.oaic.gov.au.

The types of information held by WHG

The type of personal information held by WHG includes the following:

- Names, email addresses, other contact details, residential and mail addresses, the content of correspondence with WHG (including emails, facsimiles and postal mail), gender information, occupation details, education and training information, nature of any enquiry, and other personal, medical and health related information provided by individuals to WHG or its service providers in acquiring, using or subscribing to WHG's services.
- Corporate details, email addresses, postal addresses, financial performance, board and annual reports, staff profiles (including, but not limited to, sensitive information regarding memberships of trade and professional associations) and general information to government agencies, insurers, lawyers and other third parties who deal with WHG as part of its delivery of services.

- Sensitive information (including health information, sexual orientation information and criminal records) regarding individuals obtained from those individuals, employees, insurers, government agencies, lawyers, medical practitioners, allied health professionals, training and educational service providers and contractors to WHG, for use by WHG in the delivery of its services.
- Financial information such as information provided when applying for WHG services and credit arrangement including, but limited to, credit card/banking details.
- Photographic identification.
- Information collected by WHG from visitors to its internet sites including, but not limited to, information provided when registering to use that website and details provided as part of any competitions or surveys conducted by WHG.
- Details of the behaviour of users on WHG's internet sites including, but not limited to, IP addresses (not server addresses), previous sites visited, type of browsers used, nature of electronic devices used, internet pages accessed, cookies and location information.
- Information collected by WHG from internet and social media sites including, but limited to, Facebook, LinkedIn and the PeopleStreme human resource information system.
- Information collected in relation to applications to obtain WHG services and/or the use of those services.
- Data obtained from third parties including, but not limited to, research and marketing information available within the public domain and purchased on behalf of WHG and information from the Australian Bureau of Statistics.
- Information collected from persons attending WHG conventions, seminars and functions.
- Information collected from persons applying for or attending training courses conducted by WHG.

Ways in which WHG collects personal information

- WHG collects personal information wherever reasonably practicable, directly from the individual with respect to whom the information relates.
- From individuals and their representatives (e.g. family members, insurance companies, medical practitioners, allied health practitioners, relevant government departments and agencies, employers, lawyers, accountants and banks).
- From users of WHG's services or, alternatively, from potential users of those services.
- Through WHG internet and social media sites.
- Through publicly available information services (e.g. telephone white pages, internet records).
- When WHG is required to collect the information by virtue of legal or regulatory requirements.
- When individuals participate in competitions or surveys conducted by WHG including, but not limited to, surveys relating to the quality of WHG services provided.
- From databases kept by third party providers of services to WHG and/or its members including, but not limited to, contractors who provide services to WHG.
- From organisations and individuals who use WHG services.
- From persons attending WHG conventions, seminars and functions.
- From persons applying for or attending training courses conducted by WHG.

The primary purpose for which WHG holds information

WHG holds the information referred to above for the primary purpose of enabling it to conduct its business and provide its services, including:

- To enable it to service the interests of the recipients of services provided by WHG.
- To provide internet services and maintain WHG's internet and social media sites.
- To assist WHG with marketing its services.
- To enable WHG to inform persons and organisations that have received WHG services, of additional information or services supplied by WHG that may be of interest to them.

- To provide personal information to WHG contractors who provide WHG with services to assist WHG with conducting its business.
- To enable WHG to efficiently manage its business.
- To provide seminars, conventions and educational pre-vocational training and work trial placement services.
- To enable WHG to collate data for research and statistical purposes.
- To enable WHG to meet its compliance requirements under the terms of deeds and contracts it enters into and/or administers on behalf of statutory and legislative bodies and government departments.
- To enable WHG to recruit staff.
- To enable WHG to meet its statutory obligations including, but not limited to, under taxation and corporation laws.

Disclosure of personal information to overseas recipients

WHG may disclose personal information to overseas recipients when that disclosure is consistent with the purposes set out above.

The countries associated with the overseas recipients are, potentially: New Zealand and the United Kingdom.

Right to gain access to personal information held by WHG and its complaints handling processes

Information that is stored by WHG about an individual is stored in a reasonable state of security.

Pursuant to the APPs, persons have certain rights to obtain access to personal information held by WHG with respect to that individual. Subject to the relevant exemptions contained in the APPs and subject to an individual providing sufficient proof of his or her identity, WHG will provide access to information that it holds relating to an individual. WHG reserves the right to charge a fee for the provision of this information based on the administrative cost of supplying the information requested. Further details as to these costs and the ability to access information held by us can be obtained by contacting WHG's Privacy Officer.

WHG requests, for the purposes of clarity, that any requests for access to personal information be made in writing addressed to WHG'S Privacy Officer.

WHG will generally provide access to information by providing to the individual concerned copies of relevant documents. Where, for reasons of volume or otherwise, providing copies of documents is not practical, WHG will make arrangements for the individual concerned to attend its offices to carry out a physical inspection.

Wherever possible, WHG will provide copies of documents or access to the information that we hold with respect to an individual within 14 days of the receipt of the relevant request. In the case of more complex requests, WHG will endeavour to provide access to the information within a period of 30 days.

If individuals believe that information held relating to them is incorrect, they are entitled to contact WHG's Privacy Officer to enter an amendment noting that they believe the information to be incorrect, or to provide additional updated documentation to WHG.

Should WHG believe that it is entitled to refuse a request to access information or to make corrections, it will provide written reasons for that decision.

If an individual is dissatisfied with the manner in which WHG deals with personal information, or should an individual wish to make a complaint regarding WHG's compliance with privacy laws, please contact WHG's Privacy Officer in writing.

Further information

Should any person wish to obtain further information with respect to the type of personal information WHG holds, the purposes for which WHG uses that information and/or the way in which WHG manages that information, please contact WHG's Privacy Officer at the contact details set out above.

Changes to WHG's Privacy Policy

This document sets out WHG's current Privacy Policy. This Policy will be reviewed from time to time and will be maintained in an up-to-date form. Any changes to this Policy will be posted on the relevant section of WHG's websites.



David Sagar
Chief Executive Officer