

WORKFOCUS  
AUSTRALIA

KAIROS



## Privacy Policy

*In keeping with Work Health Group's value of integrity as well as meeting our obligations in accordance with relevant state and federal legislation, we are committed to protecting the privacy of all persons who provide us with personal information through commercial activity and internal human resources processes.*

In all activities, WHG will act in accordance with the Privacy Act (1988), the Health Records Act (2001), the Privacy Amendment Act (2012), the Privacy Regulation (2013), the Privacy Amendment (Notifiable Data Breaches) Act 2017, relevant state privacy legislation and the Australian Privacy Principles.

### What is personal information?

Personal information is any information or opinion (recorded in any form) about a person, from which that person may be identified.

### Types of personal information collected

The types of personal information that may be collected and held by WHG include:

- Names, email addresses, contact details, mail addresses, correspondence (including emails, facsimiles text messages and postal mail), gender information, occupation details, education and training information, and other personal, medical and health related information provided by individuals to WHG or its service providers in acquiring, using or subscribing to WHG services.
- Corporate details, email addresses, postal addresses, financial performance, board and annual reports, team member 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) obtained from individuals, team members, 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 arrangements including, but limited to, credit card/banking details.
- Photographic identification.
- Information from WHG websites including website registration, surveys, and information related to the behaviour or users e.g. 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 internal systems, internet and social media sites including, but not limited to, Facebook, LinkedIn, Affinity and PeopleStreme information systems.
- 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.
- Information collected from persons attending WHG conventions, seminars and functions.
- Information collected from persons applying for or attending training courses conducted by WHG.

## How personal information is collected

Personal information is collected:

- Directly from the individual to whom the information relates (wherever practicable).
- From individuals and their representatives (e.g. family members, insurance companies, medical practitioners, allied health practitioners, , employers, relevant government departments and agencies, employment service providers, nominees, lawyers, accountants and banks).
- From users of WHG's services or, alternatively, from potential users of those services.
- Through WHG website and social media sites.
- Through publicly available information services (e.g. telephone white pages, internet records).
- When individuals participate in competitions or surveys conducted by WHG.
- From databases kept by third party providers of services to WHG and/or its members.
- 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.

## Primary purpose for which WHG holds information

The primary purpose for holding information is to enable WHG to conduct its business and provide its services, including:

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

## Security of personal information

WHG is committed to the protection of information from unauthorised access, use, disclosure, modification, or destruction throughout the information lifecycle. Information security risks are managed in accordance with AS/NZS ISO/IES 27002:2006 standard, **WHG Information Security Policy** and **WHG Risk Management Policy**.

## Quality of personal information

WHG takes reasonable steps to ensure that the personal information it collects, uses and discloses is accurate, up-to-date and complete.

## Correction of personal information

WHG will take all reasonable steps to correct personal information to insure it is accurate, up-to-date, complete, relevant and not misleading, either when the inaccuracy is identified by WHG or when the individual requests WHG to correct the information.



In any instance where a correction occurs, WHG will ensure all relevant stakeholders are advised of the correction and notice will be provided to the individual including reasons and available complaint mechanisms if the correction is refused.

### Disclosure of personal information

WHG only uses or discloses personal information the purpose for which it was collected (see details of primary purpose outlined above) or for a secondary purpose if an exception applies. Exceptions include, but are not limited to, where the individual provides consent for a secondary use or disclosure, or where secondary use or disclosure is required or authorised by or under an Australian law or court/tribunal order.

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 access personal information

Individuals have the right to access their personal information held by WHG. Subject to the relevant exemptions contained in the Australian Privacy Principles and subject to the individual completing a request for access form and providing sufficient proof of identify, access is provided.

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, procedure and timeframes can be obtained by contacting WHG's Privacy Officer – [privacy@workhealthgroup.com.au](mailto:privacy@workhealthgroup.com.au).

### Breach of personal information

WHG has a formalised privacy breach response strategy in the event that unauthorised access or disclosure of personal information, or loss of personal information occurs. This is outlined in the **WHG Data Breach Procedure**.

Through compliance with the Australian Privacy Principles, WHG reduces the risk of a data breach occurring at each stage of personal information handling, including collection, storage, use, disclosure, and destruction of personal information.

### 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 [privacy@workhealthgroup.com.au](mailto:privacy@workhealthgroup.com.au).

**David Sagar**  
Chief Executive Officer