

## Policy: Privacy

Spinal Life Australia's (SLA's) Privacy Policy sets out how we collect, use, store, and disclose your personal information, and how you may access and correct the personal information that we hold.

In this Privacy Policy, 'us' 'we' or 'our' means Spinal Life Australia Ltd ACN 167 906 256 and our related bodies corporate.

We are committed to managing your personal information in accordance with the Australian Privacy Principles ('APPs') set out in the Privacy Act 1988 (Cth) ('Act') and in accordance with other applicable privacy laws. By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements there may be between us. If you are in receipt of supports and services provided by us, you may choose to amend or withdraw your consent at any time. This may affect the ability for us to provide the supports and services you require. Such disclosures must be made to us in writing and will be included in your file.

We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

Personal information includes information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not. For example, this may include your name, age, gender, address and other contact details. It may also include financial information, including details of your credit card and bank account.

### What personal information do we collect?

The personal information we collect about you will depend on the nature of your relationship with us. We may collect the following types of personal information:

- your contact details (e.g. your name, address, telephone number, email address, emergency contact details and other contact details);
- your personal details (e.g. date of birth, sex, residency or citizenship status, insurance details, financial details, employment details and image);
- your sensitive personal details (e.g. gender identity, family background, relationships, culture and communication details, birthplace, language details, ATSI status and DS NMDS data);
- your health information and medical history (e.g. details of any injury, your primary disability, other disabilities, medical condition, medication, medical certificates, health reports, support requirement and assessment summaries);
- your business or company details (e.g. business or company name, address, telephone number, email address, ACN, ABN, TFN, vehicle registration number, accreditation and licence, insurance and financial details);
- your credit card and bank account details;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- Details of the services we have provided to you or that you have enquired about, including any additional information necessary to deliver those services and respond to your enquiries;
- Additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information;
- Information you provide to us through customer surveys; and
- Any other personal information that we require in order to facilitate your relationship with us.

We will provide you with the opportunity to remain anonymous or use a pseudonym in your dealings with us where it is lawful and practicable (e.g. when making a general enquiry). Generally, it is not practicable for us to interact with you anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in the events, programs and activities we manage or deliver.

### **How do we collect your personal information?**

We may collect personal information directly from you or from third parties in the following ways:

- you or your representative provide us with your personal information via our website, on the telephone or in person;
- your personal information is provided to us by a third-party authorised by you to do so (e.g. a medical practitioner, community support organisation or government agency);
- you communicate with us by mail, email, telephone or messaging services, or you share information with us via third-party social applications, services or websites; or
- you interact with us on our website or marketing communications, engage us to provide a service, attend one of our events or visit one of our locations.

In addition, when you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from recruitment consultants, previous employers and others who may be able to assist us in deciding whether or not to employ you or engage you under a contract. However, this Policy does not apply to acts or practices relating to employee records of current and former employees, which are exempt from the Act.

### **Why do we collect, use and disclose your personal information?**

We collect, hold, use and disclose personal information for the following purposes:

- to enable you to access and use our website and services;
- to determine your eligibility to access our services;
- to assess and provide the most appropriate services to you;
- to meet the requirements of government funding for programs and reporting, such as the NDIS and NIISQ;
- to apply to funding providers for equipment funding;
- to facilitate the provision of equipment;
- to determine appropriate referrals to other services;
- to determine billing and invoice requirements;
- to process payments and provide accurate receipts;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to operate, protect, improve and optimise our website and services, business and your experience, such as to perform analytics, conduct research and for advertising and marketing;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by our business partners;
- to administer rewards, surveys, contests and other promotional activities or events sponsored or managed by us or our business partners;
- to pay for goods and services;
- to manage our relationships with other businesses;

- to receive services from other businesses;
- to consider your application for a position;
- to facilitate the placement of volunteers;
- to manage our relationships with volunteers;
- to comply with our legal obligations; and
- to resolve any disputes.

We may also disclose your personal information to a trusted third party who also holds other information about you and who may combine that information to enable us both to develop anonymised consumer insights so that we can better understand you and enhance the services that you receive.

### **Do we use your personal information for direct marketing?**

We may send you direct marketing communications and information about our services. This may take the form of an email, SMS, mail or other forms of communication. You may opt-out of receiving marketing materials from us by using the opt-out facilities provided with our direct marketing communications or by contacting us using the details provided below.

### **To whom do we disclose your personal information?**

We may disclose personal information for the purposes described in this Policy to:

- our employees and related entities;
- third party suppliers and service providers (including providers who manage our website and/or our business or in connection with providing our services to you);
- professional advisers, dealers and agents;
- payment systems operators (e.g. merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies, and law enforcement agencies or as required, authorised or permitted by law.

### **Disclosure of your personal information outside Australia**

We may disclose personal information outside of Australia to third party suppliers and cloud providers located in:

- The United Kingdom; and
- The United States of America.

When you provide your personal information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with Australian Privacy Law. We will, however, take reasonable steps to ensure that any overseas recipient deals with your personal information in a way that is consistent with the APPs.

### **Using our website and cookies**

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as the pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use cookies or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your device. They enable us to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser, but our website may not work as intended if you do so.

We may also use cookies to enable us to collect data that includes personal information. For example, a cookie linked to your account is considered personal information under the Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information under this Policy.

### **Securing your personal information**

We may hold your personal information in either electronic or hard copy form. We will take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. We use a number of physical, administrative, personnel and technical measures to do so. For example, we restrict access to our electronic and hard copy files to authorised personnel and use industry-standard encryption to secure access to our electronic files. However, we cannot guarantee the security of your personal information.

If we suspect that an unauthorised party has gained access to your personal information, we will undertake an assessment of the suspected breach. Where we ascertain that a breach has occurred, we will notify you as soon as practicable after becoming aware of it, and where required by law, we will also notify the Privacy Commissioner.

We will securely destroy or de-identify personal information that we no longer require, if possible.

### **Links to third-party websites**

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not be current. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those websites and have no control over or rights in those websites. The privacy policies that apply to those other websites may differ from this Policy. You should read them before using the websites.

### **Accessing or correcting your personal information**

You are entitled to access to the personal information we hold about you. To request access to your personal information please contact our Privacy Officer using the contact details provided below.

You will not be charged for requesting access your personal information, but you may be charged for our time and any cost we incur in compiling the information you request.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. You can help us to do this by letting us know if you notice errors or discrepancies in the information we hold and by letting us know if your personal details change.

If you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you can ask us to correct it. After receiving a request from you, we will correct your information.

We may decline a request to access or correct your personal information in certain circumstances under the APPs. If we do refuse your request, we will notify you of our reasons.

### **Making a complaint**

You may contact us at any time if you have any questions or concerns about this Policy or about the way in which your personal information has been handled.

You may make a complaint about the way in which your personal information has been handled to our Privacy Officer using the contact details provided below. We will acknowledge your complaint and respond to you as soon as reasonably possible.

If you are not satisfied with our response, or you consider that we have breached the APPs or the Act, you can complain to the [Office of the Australian Information Commissioner \('OAIC'\)](#)

### **Contact us**

For further information about this Policy or our practices, to access or correct your personal information or make a complaint, please contact our Privacy Officer by sending an email to [privacy@spinal.com.au](mailto:privacy@spinal.com.au).

For alternative methods of contacting us, please visit the [Contact us](#) page on our website.

This Privacy Policy was last updated on 12 August 2019.