

Privacy Policy – Accessible Australia app

This policy applies to your use of the Accessible Australia app (**App**) and explains how and why we collect, use, hold and disclose your personal information.

In this policy, “**we**”, “**us**” and “**our**” refers to Spinal Life Australia Ltd ACN 167 906 256 and any related body corporates.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

1. Our commitment to your privacy

We recognise the importance of your privacy and understand your concerns about the security of the personal information provided to us or input into our App. We comply with the Australian Privacy Principles (**APPs**) as contained in the *Privacy Act 1988* (Cth) (**Privacy Act**). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them

2. Personal information

When we refer to personal information in this policy we mean any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

3. What personal information do we collect and hold?

When you access and use the App, we collect personal information about you (see section 4 below about how we collect your personal information). The information we collect from you will depend on how you choose to use the App. In particular:

- if you sign in by a third party provider (for example, via a Facebook or Google account), we will not collect your name or contact details. However, if you create an account using an email address, we will collect your full name and email address;
- if you choose to create a profile, we will collect your full name or nickname and details of the mobility device you use (for example, a manual wheelchair, power wheelchair, walking frame, cane, or otherwise);
- if you choose to leave a review, we will collect your opinions about the App, including your user experience.

Please be aware that while we will not collect or use any sensitive information, such as details of a health condition, the fact that you use a mobility device may in itself constitute the collection of such information.

When you use the App, we may collect information about your location or activity including your IP address. Your IP address is logged when you visit our App to analyse the ways people use our App but cannot be used to identify a user personally. Some of this information we collect using cookies and similar technologies. A cookie is a small text file that the App may place on your device to store information. You can disable these cookies on most internet browser settings.

4. How do we collect your personal information?

We collect your personal information directly from you. We collect your personal information when that information is input into the App by you or your authorised representative.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

5. Why we collect your personal information

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our services or to provide you with full use and enjoyment of the App. For example, we collect, hold and use your personal information so that we can:

- support users to be able to more easily navigate to features of the community, such as bars, cafes, restaurants and hotels, that are accessible when using a mobility device, such as a wheelchair;
- contact you including to respond to your queries or complaints, or if we need to provide you with important information;
- comply with our legal obligations and assist government and law enforcement agencies or regulators;
- improve our services and the App;
- undertake administrative tasks; and/or
- update our records and keep your records up to date.

If you do not provide us with your personal information we may not be able to provide you with our services (including access to the App), communicate with you or respond to your enquiries.

6. Who do we disclose your personal information to and why?

We may disclose your personal information where:

- we are required or authorised by law to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

If the ownership or control of all or part of our organisation changes or if we sell our rights to the App, we may transfer your personal information to the new owner.

7. Do we disclose your personal information to anyone outside Australia?

All of your personal information will be stored in servers located in Australia, unless otherwise notified to you.

8. Access and correction to the personal information we hold about you

You have a right to access and correct the personal information we hold about you. You have complete control over the personal information we hold about you and can at any time change the personal information by accessing the App.

In the event that you can no longer access the App, you may request to access and/or correct your personal information. When requesting access to or correction of your personal information, please provide us with as much detail as you can about the particular information you wish to access or correct, in order to help us retrieve it.

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date and complete.

9. Storage and security of your personal information

We take reasonable steps to protect your personal information by storing it in a secure environment. Your personal information is stored by electronic means. We take all reasonable steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. For example:

- regular auditing and monitoring our internal staff access to personal information; and
- IT System security measures.

We will also take reasonable steps to de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

10. Data breaches

If we suspect that a data breach has occurred, we will undertake an assessment into the circumstances of the suspected breach within 30 days after the suspected breach has occurred. Where it is ascertained that a breach has actually occurred and where required by law, we will notify the Privacy Commissioner and affected customers as soon as practicable after becoming aware that a data breach has occurred.

11. Third Party Sites

Our App may contain and we may provide links to third parties' websites and services. These third-party websites and services are not subject to our privacy policy. Please visit the websites of or contact these third parties to view a copy of their privacy policy.

12. Complaints and concerns

We have procedures in place for dealing with complaints and concerns about our practices in relation to the Privacy Act and the APPs. We will respond to your complaint in accordance with the relevant provisions of the APPs. For further information, please contact our Privacy Officer using the details below.

13. Contact Us

If you have any other questions about this policy, you may [contact us](#) or [leave your feedback](#).

You may also [email our Privacy Officer](#).

14. Changes to our Privacy Policy

We may change this policy from time to time or as the need arises.

This policy was last updated on 01/07/2020.