

## Privacy Policy

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### 1. General

- 1.1 This Privacy Policy applies to all Personal Information collected by Australian Vaccine Services Pty Ltd ACN 155 058 585 (**AVS**). In this Privacy Policy, AVS explains how and why it collects your Personal Information, how it uses it and what controls you have over our use of it.
- 1.2 Australian Vaccine Services is committed to complying with its obligations under the *Privacy Act 1988* (Cth) (**Act**) and the requirements of the Australian Privacy Principles (**APP**) in respect of that information.
- 1.3 In this Privacy Policy:
- (a) **OAIC** means the Office of the Australian Information Commissioner;
  - (b) **Personal Information** has the meaning given to that term in the Act;
  - (c) **Sensitive Information** has the meaning given to that term in the Act;
  - (d) **Services** means the vaccination and health care services and other associated services that are to be provided by AVS from time to time;
  - (e) **we, us** or **AVS** means Australian Vaccine Services Pty Ltd ACN 155 058 585, a proprietary limited company incorporated in Australia trading under the name Australian Vaccine Services and its associated entities as appropriate;
  - (f) **Website** means <https://www.ausvacs.com.au/> or app.ausvacs.com.au any other website from time to time from which the Services are promoted;
  - (g) **you** means you and anyone acting on your behalf or with your implied authority.

### 2. What Personal Information do we collect?

- 2.1 We collect and hold various types of Personal Information, including:
- (a) personal details, including your name and date of birth;
  - (b) contact details, including your email address, mailing address and telephone number;
  - (c) Sensitive Information, including health information, medical history, family history and the details of vaccinations and immunisations received by you in conjunction with the Services or previously provided to you by us or other entities;
  - (d) Medicare and private healthcare information;
  - (e) financial information, including banking details, billing and payment details, where you elect to use our reimbursement services;
  - (f) family contact information;
  - (g) the opinions of our staff and contractors determined while providing any Services to you;
  - (h) information necessary for or incidental to the provision of the Services; and

- (i) any other Personal Information that may be required in order to facilitate your dealings with us.

### **3. How do we collect Personal Information?**

3.1 We may collect Personal Information from you when:

- (a) your employer provides us with Personal Information in connection with the Services;
- (b) you communicate with us through your employer, AVS partner, our Website, email or telephone;
- (c) you use a voucher provided by us;
- (d) you interact with or use our Website or any online platform maintained by us including by making an online appointment, ordering a voucher or using an online service with us;
- (e) you communicate with our staff or other representatives during the course of providing the Services (including information collected through the Australian Immunisation Register or MyHealth Record /PCEHR System); and
- (f) you otherwise deal with us in the course of our business.

3.2 We may also collect Personal Information from third parties, including:

- (a) your guardian or responsible person;
- (b) other health care providers such as pharmacies, hospitals and community health services;
- (c) your private health insurer;
- (d) law enforcement agencies; and
- (e) government agencies (such as Centrelink, Medicare, Department of Social Services, National Disability Insurance Agency, Department of Veterans Affairs, and other government agencies responsible for medical services).

3.3 Where we solicit Personal Information, we only collect:

- (i) non-Sensitive Information, if it is reasonably necessary for the Services; and
- (ii) Sensitive Information, if it is reasonably necessary for or directly related to Services and you have consented to its collection, or its collection is permitted or authorised by law.

3.4 If we solicit Personal Information, we will generally solicit it directly from you or from a third party with your consent, unless it is unreasonable or impracticable for us to do so. Where we collect Personal Information about you from a third party without your prior consent, we will take reasonable steps to inform you that we have collected Personal Information.

3.5 You have the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorised by law to only with identified individual

#### **4. How do we store and protect Personal Information?**

- 4.1 We prioritise the security of your Personal Information whilst it is in our possession.
- 4.2 We may hold Personal Information in various forms, including but not limited to physical documents and electronic records. Physical files are kept securely inside lockable filing cabinets within our lockable and access controlled storage areas and offices. Electronic files are stored securely on protected information systems (including through passwords and firewalls) and are only accessible through our secure IT systems. We maintain physical security over our paper and electronic data stores and standard confidentiality obligations form part of the employment contracts for all of our staff members and contractors.
- 4.3 We take reasonable steps to:
- (a) ensure that Personal Information we collect is accurate, up-to-date, complete and relevant, other than where it is only collected to provide advice in respect of a particular point in time, in which case we will seek to ensure it is accurate, complete and relevant as at that particular point in time;
  - (b) ensure that Personal Information we use or disclose is accurate, up-to-date, complete and relevant, having regard to the purposes for which Personal Information is used or disclosed;
  - (c) protect Personal Information from misuse, interference and loss, and from unauthorised access, modification or disclosure; and
  - (d) destroy or de-identify Personal Information which we no longer need for the purposes for which it was collected, except where it is necessary to retain it:
    - (i) in order to maintain ongoing records for you; or
    - (ii) as required by law.
- 4.4 We cannot guarantee the security of information transmitted via the internet. As such, transmission of Personal Information via the internet is at your own risk and we cannot be held responsible for the security of such information.

#### **5. Why do we collect, hold, use and disclose Personal Information?**

- 5.1 We may collect, hold, use and disclose your Personal Information for the following purposes:
- (a) for the purpose(s) for which it was disclosed to or collected by us;
  - (b) for secondary purposes where it would be reasonable to expect us to do so, and that secondary purpose is related (or directly related in the case of Sensitive Information) to the primary purpose for which it was collected; and
  - (c) for any other purposes for which you have consented from time to time.
- 5.2 The above purposes include using and disclosing your Personal Information:
- (a) to supply the Services to you or facilitating other interactions with you in the course of operating our business;
  - (b) to share your Personal Information to employees, contractors or other third party service providers of AVS to assist us with providing the Services;

- (c) to your employer following performance of the Services, if the Services were provided to you by us at the direction of your employer;
- (d) to third party health care providers;
- (e) to respond to your enquiries and provide you with relevant information;
- (f) to process authorised payments;
- (g) to update your Personal Information;
- (h) to collect information required for reporting to relevant regulatory bodies;
- (i) as permitted or required by law; and
- (j) for any other uses identified at the time of collecting your Personal Information.

5.3 We may also share your Personal Information:

- (a) with third parties who work with our business for business purposes, such as accreditation agencies or information technology providers. These third parties are required to comply with APPs and this Privacy Policy;
- (b) when it is necessary to lessen or prevent a serious threat to your life, health or safety or public health or safety, or it is impractical to obtain your consent;
- (c) to assist in locating a missing person;
- (d) to establish, exercise or defend an equitable claim;
- (e) for the purpose of confidential dispute resolution process;
- (f) when there is a statutory requirement to share certain Personal Information; and
- (g) during the course of providing any medical services through the Australian Immunisation Record or MyHealth Record/PCEHR system.

5.4 If we engage third party contractors to perform services for us which involves handling Personal Information, we will take reasonable steps to prohibit the contractor from using Personal Information except for the purposes for which it was supplied.

**6. Do we use your Personal Information for communications?**

6.1 We will only send you direct marketing communications and information via mail, email and social media platforms about our Services with your consent. If you do not provide your consent to receive direct marketing communications, you may opt-out of receiving marketing communications from us by contacting us at the details below or by using opt-out facilities provided in our communications. We do not provide your Personal Information to other organisations for the purposes of their direct marketing.

**7. Overseas disclosure**

7.1 It is unlikely that we will need to disclose your Personal Information to an overseas recipient or otherwise store your Personal Information overseas.

7.2 If we are ever required to do so, we will obtain your informed consent or ensure that the overseas recipients comply with the APPs.

## **8. Using our Website and cookies**

- 8.1 To improve your experience on our Website, we may use 'cookies', being small data files that are served by our platforms and stored on your device. These may be used by us or third parties for a variety of purposes including to operate and personalise the Website. Cookies may be used for recording preferences, conducting internal analytics, conducting research to improve our offering, assisting with marketing and delivering certain website functionality.
- 8.2 You may refuse to accept cookies by selecting the appropriate setting on your internet browser. However, please note that if you do this, you may not be able to use the full functionality of our Website.

## **9. Third party links**

- 9.1 For your convenience and to improve the usage of the Website and Services we may insert links to third-party websites, applications or resources, for which this Privacy Policy does not apply.
- 9.2 AVS is not responsible for those third party websites, applications or resources. If you access such websites, applications or resources, you do so at your own risk and we make no representations or warranties regarding third parties' privacy practices. We encourage you to read the privacy statements/policies of every website, application or resource you use.
- 9.3 When we do link to a third party website, application or resource, this does not automatically imply that AVS endorses that website, application, resource and their contents.
- 9.4 Our Privacy Policy does not cover the use of cookies by any third parties.

## **10. Accessing or correcting your Personal Information**

- 10.1 We are committed to maintaining accurate, timely, relevant and appropriate information.
- 10.2 Where requested, we will provide you with a copy of the Personal Information that we hold which relates to you, provided that the request is made in accordance with the APPs (contained in the Act). We will also update any inaccurate information about you if you inform us that the information is inaccurate, out of date, incomplete, irrelevant or misleading.
- 10.3 There are no charges for requesting access to or the correction of your Personal Information, however if the volume of information we hold is excessively large, we reserve our rights to charge you any reasonable administration fees (including fees for photocopying) associated with your request.
- 10.4 You can contact our responsible privacy officer regarding access to or correction of your information by any of the following methods:

**Email: [sales@ausvacs.com.au](mailto:sales@ausvacs.com.au)**

**Post: 406/1 Bryant Drive, Tuggerah NSW 2261**

**Phone: 1800 FLU VAC or 02 8097 0753**

- 10.5 We will respond to those requests within 30 days in accordance with our obligations under the Act. If we refuse a request to access or correct Personal Information, where reasonable, we will provide you our reasons for doing so and information about your ability to complain about such refusal.

10.6 In order to protect the confidentiality of your Personal Information, details of your information will only ever be passed on to you where we are satisfied that the information relates to you. Accordingly, we may request documentation from you which confirms your identity before passing on any Personal Information which relates to you.

#### **11. Making a complaint**

11.1 If you have a complaint about our Privacy Policy or the collection, use, disposal or destruction of your Personal Information, your complaint should be directed in the first instance to our responsible privacy officer at the details set out above.

11.2 We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of Personal Information held by us about you in accordance with the Act. If you are not satisfied with the outcome of this process, then you may contact the OAIC.

#### **12. Privacy Policy changes**

12.1 We may change this Privacy Policy at our discretion. If we do so, the latest version of our privacy policy will be available on our Website at [www.ausvacs.com.au/resources/](http://www.ausvacs.com.au/resources/), and it will apply to all your Personal Information held by us at that time.

#### **13. Further information**

13.1 If you require any further information or have any queries regarding our Privacy Policy, please contact our privacy officer at the details set out above.

13.2 Should you wish to read more information on the Act, we recommend that you visit the website of the OAIC at [www.oaic.gov.au](http://www.oaic.gov.au).