

# AHA Privacy Policy

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## Background

Australian Healthcare Associates must comply with the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (Privacy Act). The APPs are legally binding principles that are designed to ensure that individuals' personal information is protected from the time the information is collected through to its destruction. The APPs also give individuals the right to access their personal information and have it corrected.

This Privacy Policy describes how Australian Healthcare Associates (AHA) protects individuals' privacy and handles personal information in accordance with the Privacy Act and APPs. Information in this policy is set out under the following headings:

- Collection of personal information
- Purposes for which personal information is collected, held, used and disclosed
- Disclosure of personal information
- Access to personal information
- Protection of personal information
- Complaints process
- Updating process.

## Collection of personal information

AHA may collect personal information via:

- The receipt of data from clients which includes personal information; or
- Direct collection of personal information from individuals during the course of delivering services under contracts with our clients.

Personal information that AHA collects will vary from contract to contract, depending upon the scope of services associated with the contract and arrangements agreed with our client. Information that AHA may collect includes:

- Names
- Addresses
- Telephone numbers
- E-mail addresses
- Date of birth
- Gender
- Job titles
- Bank account details.

On occasion we also may collect sensitive information, for example:

- Health, medical or similar information
- Ethnic origin
- Professional memberships.

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Direct collection of personal information may occur via forms filled out by individuals, face to face meetings, email messages and/or telephone conversations. We may keep a record of that contact if individuals contact us.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with AHA as usually we need to use personal information to provide specific services which relate to or involve specific individuals.

If an individual believes that information AHA holds is incorrect or out of date, or if an individual has concerns about how we are handling personal information, we can be contacted to resolve these concerns by telephoning 03 9663 1950.

If an individual wishes to have personal information held by us deleted, an individual may contact us and we will take reasonable steps to delete it (unless we need to keep it for legal, contractual, auditing or internal risk management reasons). In circumstances where we have refused access to, or correction of, personal information, we will provide a written notice that sets out:

- the reasons for the refusal where it is reasonable for us to do so; and
- the way in which you may make a complaint about such refusal.

## Purposes for which personal information is collected, held and used

The purpose for which AHA collects, holds, uses and discloses personal information will vary depending on the function and activity being undertaken and may include one or more of the following:

- to provide our services
- to respond to an individual's request
- to maintain contact with clients
- for general management and reporting purposes, such as invoicing and account management
- for recruitment purposes
- for purposes related to the employment of our personnel and providing internal services to our staff; and
- other purposes related to our business.

## Disclosure of personal information

AHA does not disclose personal information to other organisations unless:

- use or disclosure is permitted by this policy
- personal information has been collected in the course of delivering services under contract for a third-party organisation and that organisation requests that information be transferred to them
- we believe it is necessary to provide an individual with a product or service which has been requested (or, in the case of an employee or contractor of AHA, it is necessary for maintaining or related to the individuals' role at AHA)

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- to protect the rights, property or personal safety of any member of the public or a customer of AHA or the interests of AHA
- some or all of the assets or operations of AHA are or may be transferred to another party as part of the sale of some or all of AHA' business
- an individual consents; or
- such disclosure is otherwise required or permitted by law, regulation, rule or professional standard.

AHA does not disclose personal information to individuals or organisations located outside of Australia.

## Access to personal information

We will provide access to personal information upon request by an individual, except in the limited circumstances in which it is permitted for us to withhold this information (for instance, where granting access would infringe another person's privacy).

When a request to access personal information is made, we will require the individual to provide some form of identification (such as a driver's licence or passport) so we can verify the person to whom the information relates.

If at any time an individual would like to know what personal information we hold in relation to a particular engagement we are undertaking or have undertaken, then a request may be made in writing to:

Privacy Request  
Australian Healthcare Associates  
Reply Paid 86905  
Collins Street East, VIC 8003  
[privacy@ahaconsulting.com.au](mailto:privacy@ahaconsulting.com.au)

In circumstances where we have refused an individual access to, or correction of, their personal information, we will give them a written notice that sets out:

- the reasons for the refusal where it is reasonable for us to do so; and
- the way in which they may make a complaint about such refusal.

## Protection of personal information

We hold personal information in hard copy and electronic formats. We use a range of physical, operational and technological security measures to protect this information. These measures include:

- Staff education and training to ensure our staff are aware their privacy obligations when handling your personal information

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- Administrative and technical controls to restrict access to personal information to only those people who need access
- Technological security measures, including fire walls, encryption and anti-virus software
- Physical security measures, such as staff security passes to access AHA premises, and the use of privacy screens where appropriate.

Some or all of this personal information may be available to authorised staff of AHA for use in accordance with this policy.

AHA will endeavour to take all reasonable steps to keep secure any information which we hold about individuals, whether electronically or in hard-copy, and to keep this information accurate and up to date. We also require our employees and data processors to respect the confidentiality of any personal information held by AHA.

AHA aims to achieve industry best practice in the security of personal information which it holds. It is our policy not to retain personal information once there is no longer a legal or business need for us to do so.

## Complaints process

If AHA becomes aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our privacy policy, or you have a problem or complaint, please contact Richard Stock at AHA. If you are not satisfied with our handling of your problem or complaint you may make a complaint to the Australian Information Commissioner:

Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001  
1300 363 992  
[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## Updating process

AHA may update this privacy policy at any time by publishing an updated version on this website and aim to review this policy annually to keep it current.

The amended policy will apply between us whether or not we have given you specific notice of any change.