



# Privacy Policy

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Daniels Health

DATE: July 2016

## **Purpose**

Daniels Health is comprised of Daniels Health Pty Ltd and its wholly owned subsidiaries, collectively referred to as 'Daniels Health'. Daniels Health is committed to protecting the privacy and Personal Information of our customers, employees and business associates in accordance with the Privacy Act 1988 (Cth) (**Privacy Act**) and Australian Privacy Principles (**APPs**).

Daniels Health reserves the right to modify this Privacy Policy at any time. The current version of our Privacy Policy can be accessed on our website [www.DanielsHealth.com.au](http://www.DanielsHealth.com.au) or by contacting our Privacy Officer (details below).

## **Personal Information**

Daniels Health only collects information that is relevant to our business or employment relationship with you. The kind of Personal Information that we collect and hold about you will depend upon our relationship with you, whether we collect the information from you as a customer, supplier, stakeholder, job applicant or in some other capacity. Personal Information includes information or opinions in any form (whether true or not), about an identified individual who is reasonably identifiable.

The kind of Personal Information Daniels Health collects includes name, address, phone and fax numbers, email address, date of birth, drivers licence details, passport and visa details, bank account details, credit card details, curriculum vitae, purchase history, purchase enquiries, tax file numbers, photos and videos and any information that you provide to us or our representative or allow us to collect (e.g. criminal history checks for job applicants).

In respect of customers that are organisations, we may retain Personal Information of key contacts within your organisation.

If we are unable to collect your Personal Information we may not be able to provide you with our products or services or do business with you. We will only collect Sensitive Information about you with your consent (unless we are otherwise allowed or required by law to collect that information) and where it is absolutely necessary. Sensitive Information includes information or an opinion about an individual's racial or ethnic origin,

political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, biometric information, biometric templates, health information about an individual and genetic information.

## **Collection**

Daniels Health aims to collect Personal Information directly from you, unless it is unreasonable or impracticable to do so. We may collect Personal Information in a variety of ways, including from you directly (including when you interact with us in writing, electronically or verbally), when you visit our website (cookies are enabled), when you participate in our events or promotions or meetings, when we supply products or services to you and from public sources of information, marketing material and marketing lists which are legally acquired by us. Information that we obtain about you directly is the result of our relationship with you and it is important to us that this information is accurate and up to date.

Daniels Health may obtain Personal Information about you from 3<sup>rd</sup> parties, but at all times makes reasonable enquiries to ensure that the collection of this information is done in a lawful manner.

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

Our website is linked to the internet and the internet is inherently insecure, we cannot therefore guarantee that security of transmission of your communications to us online. Any personal information or other information that you transmit to us online is done so at your own risk.

## **Use of Information**

Personal Information is collected, held and used for the purpose of performing business activities and functions to ensure that we are providing quality services to our customers and managing our employment relationships. In doing this we may collect, hold and use the Personal Information to:

- perform our administrative and accounting functions (including quality control,

research, billing, debt recovery and conducting fraud checks);

- provide products and services to you;
- provide communications to you;
- provide information, advice and assistance to you regarding our existing products or services or about new products or services that may be of interest;
- conduct marketing and promotions (including market research, statistical collation and website traffic analysis);
- plan our product and service development;
- maintain up to date records and contact information; and
- enable us to comply with relevant legislation.

In conducting any marketing and promotional communications, we will provide you with the opportunity to opt out. Our opt out procedures are included in our marketing communications. If you wish not to receive marketing material from us, please contact your Account Manager or in the absence of an Account Manager the Privacy Officer on the details below. We do not sell your Personal Information to third party organisations.

### **Disclosure**

Daniels Health employees will have access to your Personal Information as appropriate within an employee's role and responsibilities set out in their Position Description. Security measures are in place to ensure that inappropriate access does not occur.

Daniels Health may provide your Personal Information to our contractors but this is only done so where required to assist us in carrying out our business functions and activities (e.g. customer service and call centre operations). In doing so, we take reasonable steps to ensure that the contractor adheres to our Privacy Policy. Your information is provided to them in a confidential manner for the sole purpose of performing the contracted service. Your privacy is respected and we do not sell, rent or trade your Personal Information.

Daniels Health operates predominately within Australia and New Zealand, but does also have relationships with businesses located in the USA, Canada, UK and South Africa. In the course of doing business with you, we may disclose some of

your personal information to these overseas recipients. However, we will only do so where:

- it is necessary to complete the transaction you have entered into; and
- you have provided consent; or
- we believe on reasonable grounds that the overseas business is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- it is otherwise permitted by law.

### **Storage**

Daniels Health holds your Personal Information in both paper and electronic format but in doing so ensures that it holds this information securely by maintaining appropriate IT and Office security systems to reduce the chances of misuse, loss and unauthorised access, modification or disclosure.

When Personal Information is stored or archived off site, Daniels Health ensures that our storage contractors implement privacy safeguards.

### **Destruction and De-identification**

We will retain your Personal Information whilst it is required for any of our business functions, or for any other lawful purpose.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed.

### **Enquiries & Complaints**

If you have any inquires or complaints in respect of the Personal Information that Daniels Health holds about you, how Daniels Health manages your Personal Information or our compliance with the APPs, please contact our Privacy Officer. We will respond to your request in accordance with the relevant provisions of the APPs. Our Privacy Officer can also be contacted to update or correct the accuracy of the Personal Information that we hold about you.

### **Contact Us**

Privacy Officer  
Daniels Health Pty Ltd  
36 Cahill Street  
Dandenong South VIC  
T: (03) 8762 8300  
E: [privacy.officer@danielshealth.com.au](mailto:privacy.officer@danielshealth.com.au)



# Privacy Act Requests

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For Access and Correction and Complaints

DATE : August 2016

Daniels Health Pty Ltd (**Daniels Health**) is committed to complying with the Privacy Act.

### **Requests for access to personal information**

In many cases, you are entitled to access the personal information that we hold about you. To request access, please contact our Privacy Officer.

- If we agree to give you access, we will do so in the manner requested by you, provided it is reasonable and practicable for us to do so.
- If we cannot give you access in the manner requested, we will endeavour instead to grant access in a way that meets both of our needs.
- If we cannot give you access at all, we will give you written reasons why, and advise you of the further actions you can take. For example, the Privacy Act allows us to refuse access where it would have an unreasonable impact on the privacy of others.

We will respond to your request for access within a reasonable period of time.

We will not charge you any fees for making a request for access to personal information. However, some fees may be incurred in providing you with access (eg. photocopying costs).

### **Requests for correction of personal information**

You may request us from time to time to update and/or correct the personal information that we hold about you. Where your personal information has been disclosed to third parties, you may also request us to notify those third parties of the changes. To make these requests, please contact your Customer Service / Administration Officer in your State.

- We will take reasonable steps to comply with your requests, unless it is impracticable or unlawful for us to do so.
- If we refuse to correct personal information as requested, we will give you

written reasons why, and advise you of the further actions that you can take.

We will respond to your correction request within a reasonable period of time.

We will not charge you any fees for making a request for correction of personal information.

### **Complaints and Concerns**

Daniels Health has developed procedures to assist you to resolve a complaint or concern about our privacy practices. Our complaint procedures are available to you free of charge.

#### How to make a complaint

In the first instance, please contact the Privacy Officer to submit your complaint. We would like to be the first to know if you are not happy with our privacy practices. You can contact us verbally or in writing. The Privacy Officer may request you to provide certain documents and other information to fully understand your complaint and the remedy you are seeking.

#### Our response

We will:

- (a) confirm receipt of your complaint within 7 days; and
- (b) endeavour to resolve your complaint within 30 days. If we consider more time is needed, we will notify you in writing and ask you to agree to a reasonable extension of time.

We will give you written notice of our decision in relation to your complaint.

We will also notify other interested parties of the existence and resolution of your complaint, unless it is impracticable or unlawful for us to do so.

### **Contact**

Privacy Officer  
Daniels Health Pty Ltd  
34-36 Cahill Street  
Dandenong South VIC 3175  
T: (03) 8762 8300  
F: (03) 8762 8342  
Privacy.Officer@DanielsHealth.com.au