

PRIVACY POLICY

1. INTRODUCTION

- Provider has adopted this Policy in accordance with Australian privacy law.
- This Policy outlines how Provider deals with Personal Information, which it collects in conjunction with the Services.
- Provider may also collect information about Individuals who do not use the Services.
- Capitalised words in this Policy are defined terms. Defined terms are explained at the end of this Policy.

2. COLLECTING PERSONAL INFORMATION

Provider collects Personal Information when:

- an Organisation registers or subscribes for an account;
- the Service automatically captures Personal Information in content Organisations post on the Services; and
- Provider's server and analytics service log details about Organisations use of the Services

Provider collects Personal Information about Individuals from third parties when Organisations give Provider access to files containing Personal Information.

Provider usually collects Personal Information (but not Sensitive Information) for the following purposes:

- (a) The primary purpose of providing the Services (Primary Purpose).
- (b) Any purpose secondary to the Primary Purpose.
- (c) Direct marketing by us or third parties.

3. ORGANISATIONS USING THE SERVICES

Provider provides the Services to Organisations, which use them as business and information management tools. Both Provider and Organisations may collect Personal Information from Individuals, including when:

- Individuals register for or access a service provided by the Organisation using the Services;
- Organisations collect information directly from Individuals using the Service;

- Organisations give Provider access to their files containing Personal Information; and
- Organisations enter or process information (such as notes or files) about Individuals using the Services.

4. TYPES OF INFORMATION THAT PROVIDER COLLECTS AND HOLDS

Using processes described in this Policy, Provider collects the following categories of Personal Information about Individuals:

- **(Content)** whatever Personal Information is included in content Organisations share with Provider;
- **(Identity Information)** name, date of birth, nationality, medicare number;
- **(Behaviour Information)** habits, prescriptions, movements, trends, decisions, associations, memberships, finances, purchases;
- **(Internet Data)** data typically collected by analytics services like Google Analytics.

6. SENSITIVE INFORMATION

Privacy law categorise certain types of Personal Information as “sensitive information”. Provider collects the following kinds of sensitive information:

- Health Information about an Individual, including:
 - any information or opinion about the Individual’s health; and
 - information collected when Organisations use Services, including Individuals’ prescriptions, medical issues affecting Individuals, and previous prescription history.

If Organisations submit, post or store any Sensitive Information using the Services, Provider takes this as indicative of Individuals’ prior consent to its management of the information in accordance with this Policy.

Organisations must seek the consent of individuals before providing Provider with any Sensitive Information.

Provider will only use or disclose an Individual’s Sensitive Information for a secondary purpose if:

- (a) that secondary purpose is directly related to the primary purpose of providing the Services; and
- (b) the Individual would reasonably expect Provider to use or disclose the information for the secondary purpose.

6. HOW PROVIDER STORES PERSONAL INFORMATION

Provider holds and stores Personal Information using:

- **(Storage services)** third party data storage services, including applications and software;
- **(Provider Devices)** devices operated by employees of Provider's business.

7. SECURITY

Provider will take reasonable precautions to protect Personal Information from unauthorised access. This includes measures to secure the Provider's physical facilities and electronic networks. Provider secures Personal Information that Provider collects with credentials, passwords, pins, encryption, session expiry, firewalls, SSL network encryption, and through the use of reputable vendors.

For more information on security, please contact Provider using the details in the "contacting us" below.

8. DELETION PROCEDURES

Provider deletes Personal Information when Organisations direct that Personal Information is no longer needed.

9. WHY DATA IS HELD, USED AND DISCLOSED

Provider's handling of Personal Information includes holding, using and sometimes sharing the Personal Information so that Provider can:

- provide functionality within the Services;
- provide notifications and support;
- transact and process payments;
- assess and improve the Services;
- provide secure access to the Services.

For more information on when Provider shares Personal Information, see below.

10. HANDLING OF DATA

Some collection, holding, use and disclosure of Personal Information happens simply by virtue of Organisations using the Services. The purpose of the Service is to allow Organisations and Provider to enter, manage, communicate and publish information, including Personal Information and Sensitive Information.

11. SERVICE PROVIDERS CAN ACCESS PERSONAL INFORMATION

When Provider uses the services of companies that Provider works with to provide the Services, those companies may get access to the Provider's data, including Personal Information. Such third party services may include:

- **(Hosting)** Cloud and web hosting service providers;
- **(SaaS)** providers of software as a service;
- **(Support)** providers of IT support services, web and software development;
- **(Data analytics)** Google Analytics (see <http://www.google.com/intl/en/policies/privacy/>);
- **(Online payment)** providers of online payment systems; and
- **(Apple device functionality providers)** Apple location services, Siri dictation, Apple Maps, Apple Notifications (see <http://www.apple.com/au/privacy/>).

Provider will only share Personal Information with these third parties to the extent reasonably necessary to perform their functions.

These third parties may have their own privacy and security policies. For more information about this, please contact Provider using the details listed in the "contacting us" section below. For information on disclosures to overseas recipients, see below.

12. DISCLOSING INFORMATION OVERSEAS

The Organisations may store or process some Personal Information overseas. Individuals may not have the same rights relating to their information when it is overseas as they would under Australian privacy law.

By providing Provider with Personal Information, Individuals consent to the transfer of their Personal Information to overseas recipients as contemplated by this Policy. If Individuals consent to such transfer, Provider will not be accountable for overseas recipients' handling of their Personal Information.

13. CONTACTING US

Individuals contact the Provider using the details below if they want to access, correct or delete Personal Information or lodge a complaint.

Privacy Officer
P O Box 1617
BROWNS PLAINS BC 4118
or
compliance@compact.com.au

Provider reserves the right to refuse access or correction where there are reasonable grounds for doing so, for example if providing access would be unlawful or would compromise the privacy of another person.

14. COMPLAINTS PROCESS

If Individuals have a complaint about privacy, they can contact Provider using the details listed above.

Provider will respond to complaints in writing within a reasonable period (usually 10 business days from the day Provider receives an email).

Provider will try to work with Individuals to resolve complaints entirely within 20 business days, although that period may be longer if it is reasonable to take longer given the nature of the complaint.

If Individuals are unsatisfied with our response, they may refer the complaint to the Office of the Australian Information Commissioner (<http://www.oaic.gov.au/>).

15. AMENDMENT

Provider may amend this Policy at its sole discretion. Organisations should alert their customers if Provider alters this Policy. Organisations that continue to use the Services after receiving notice from Provider of such an amendment, agree to be bound by this Privacy Policy as amended.

16. DEFINITIONS

Health Information

Has the meaning given to that term by the Privacy Act 1988 (Cth).

Individual, Individuals

means a natural person.

Organisation, Organisations

means third party Organisations using the Services including pharmacists, doctors, and any other medical professional using the software known as 'emma'.

Personal Information

means information about an Individual whose identity is apparent, or can reasonably be ascertained, from that information. This includes information like names, telephone numbers, email addresses and physical addresses.

Policy, Policies

means this document, drafted in accordance with the Privacy Act 1988 (Cth).

Provider

means Compact Business Systems Australia Pty Ltd.

Sensitive Information

Has the meaning given to that term by the Privacy Act 1988 (Cth).

Service, Services

means the software services known as 'emma'.