



Seachange Paediatrics

Website Privacy Policy

This privacy policy applies to all Personal Information collected by Seachange Paediatrics Pty Ltd (**We, Us or Our**) via the website located at www.seachangepaeds.com.au (**Website**).

1 What information do We collect?

The kind of Personal Information that We collect from you will depend on how you use the Website. The Personal Information which We collect and hold about you may include:

- (a) contact details relevant to providing our services including your and your children's name, birth date, address, e-mail address and phone number, age, username, password and other registration information, financial information, personal description photographs, employment and contact information;
- (b) social media links;
- (c) property and location information;
- (d) Medicare numbers;
- (e) current and past medical history (this includes details of previous test results, current and past procedures, medications currently being taken);
- (f) the results of any tests or procedures;
- (g) other health information provided by any party;
- (h) information relevant to any insurance claim you may have;
- (i) information from a third party (relevant person) given to us in the course of our business, specifically to enable you to buy or participate in a service or products offered to you;
- (j) other information relevant to the customisation of a document or provision of the services;
- (k) information you send to us by use of our Website, a third-party site, by email, by telephone or by other physical medium.

2 Types of information

The Privacy Act 1998 (Cth) (**Privacy Act**) defines types of information, including Personal Information and Sensitive Information.

- (a) Personal Information

Personal Information means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (i) whether the information or opinion is true or not; and
- (ii) whether the information or opinion is recorded in a material form or not.



If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “Personal Information” and will not be subject to this privacy policy.

(b) Sensitive Information

Sensitive Information is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive Information will be used by Us only:

- (i) for the primary purpose for which it was obtained;
- (ii) for a secondary purpose that is directly related to the primary purpose; and
- (iii) with your consent or where required or authorised by law.

3 How We collect your Personal Information

- (a) We may collect Personal Information from you whenever you input such information into the Website, related app or provide it to Us in any other way, including by email or in person.
- (b) We may also collect cookies from your computer which enable Us to tell when you use the Website and also to help customise your Website experience. As a general rule, however, it is not possible to identify you personally from Our use of cookies.
- (c) We generally don't collect Sensitive Information, but when We do, We will comply with the preceding paragraph.
- (d) Where reasonable and practicable We collect your Personal Information from you only. However, sometimes We may be given information from a third party, in cases like this We will take steps to make you aware of the information that was provided by a third party.

4 Purpose of collection

- (a) We collect Personal Information to provide you with the best service experience possible on the Website and keep in touch with you about developments in Our business.
- (b) Your Personal information is typically used:
 - (i) for verifying your identity for security purposes;
 - (ii) for internal record keeping;
 - (iii) to make any relevant assessment of your health status to determine the appropriate specialist to continue your clinical care;
 - (iv) to make appointments for for you;



- (v) to make transport arrangements if required to assist you to attend an appointment made for you;
 - (vi) to provide a specialist medical report about your health to those persons involved in your care or claim, as required to deliver the Services;
 - (vii) to carry out administrative functions such as billing;
 - (viii) to send appointment reminders;
 - (ix) to send reminder notices for specific tests as required by law;
 - (x) to communicate with teachers, allied health providers and other professionals involved with your child. Please let us know if you do not want your records accessed for these purposes;
 - (xi) In an emergency situation where it is in the best interest of your child's health care we would disclose appropriate information if requested to do so; and
 - (xii) to provide to anyone authorised or directed by you.
- (c) The information may also be provided to other parties, including medical practitioners (such as radiologists), insurers, legal representatives, employers and transport service providers.
- (d) Information which does not identify any individual may be used in a general way by us or third parties to provide class information, for example relating to demographics or usage of a particular page or Service.
- (e) We may log information about your access and use of our Website, including through the use of Internet cookies and measurement tools, your communications with our Website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider. We do not presently associate such information with an identifiable person.
- (f) We may contact you by a variety of measures including by telephone, email, sms or mail. If you wish to update your contact details or change the way we contact you, please contact us at the details below.
- (g) We customarily only disclose Personal Information to Our service providers who assist Us in operating the Website. Your Personal Information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.
- (h) We may disclose personal information including:
- (i) to verify personal information details upon request from third parties;
 - (ii) to comply with our legal and regulatory obligations, including disclosure and reporting to Commonwealth, State and Territory government agencies;
 - (iii) for users under 18, information regarding attendance, progress and general well-being may be provided in order to keep parent(s) and/or guardian(s) adequately informed. If you are under 18, you may use our site only with consent from a parent or guardian;



- (iv) to credit reporting agencies and courts, tribunals, regulatory authorities where clients fail to pay for services provided by us to them;
 - (v) to courts, tribunals, regulatory authorities, and law enforcement officers as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
 - (vi) to the relevant third party or parties, if the matter involves third parties.
- (i) It is necessary for us to disclose your personal and sensitive information to some third parties. These parties include: medical practitioners (including radiologists), insurers, legal representatives, employers and transport service providers.
 - (j) When we obtain information from a relevant person, we assume that in giving us your information, you are also giving us permission to pass it to the relevant person.
 - (k) By providing us with personal information, you consent to this disclosure. Where we disclose your personal information to third parties, we will request or otherwise seek to get comfortable that the third-party follows the Australian Privacy Principles regarding handling your personal information. However, if you provide information to us with a view to it being read, copied, downloaded or used by other people, we accept no responsibility for what that third party may do with it. It is up to you to satisfy yourself about the privacy level of every person who might see your information. If it is available to all the World, you have no control whatever as to how it is used.
 - (l) If there is a change of control of our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law, our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser. We would seek to only disclose information in good faith and where we have sought to maintain confidentiality.
 - (m) By using Our Website, you consent to the receipt of direct marketing material. We will only use your Personal Information for this purpose if We have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from use. We do not use sensitive Personal Information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature, such as an unsubscribe button link.

5 Security, access and correction

- (a) We store your Personal Information in a way that reasonably protects it from unauthorised access, misuse, modification or disclosure. When We no longer require your Personal Information for the purpose for which We obtained in, We will take reasonable steps to destroy and anonymise or de-identify it. However, most of the Personal Information that is stored in Our client files and records will be kept for a minimum of 10 years to fulfill Our record keeping obligations.
- (b) We are committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure that information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.



- (c) No information transmitted over the Internet can be guaranteed to be secure. We cannot guarantee the security of any information that you transmit to us, or receive from us. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.
- (d) The Australian Privacy Principles (**APP**):
 - (i) permit you to obtain access to the Personal Information We hold about you in certain circumstances (APP 12); and
 - (ii) allow you to correct inaccurate Personal Information subject to certain exceptions (APP 13).
- (e) Where you would like to obtain such access, please contact Us in writing on the contact details set out at the bottom of this privacy policy.

6 Complaint procedure

- (a) If you have a complaint concerning the manner in which We maintain the privacy of your Personal Information, please contact Us on the contact details set out at the bottom of this privacy policy.
- (b) All complaints will be considered by Our privacy officer and We may seek further information from you to clarify your concerns. If We agree that your complaint is well founded, We will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner (OAIC).

7 Overseas transfer

- (a) We do not typically or routinely disclose personal information to overseas recipients unless consent has been given, or an exception under the Australian Privacy Principles applies. We will only disclose personal information to overseas recipients where reasonable steps have been taken to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information. In circumstances where information is disclosed to overseas recipients, those recipients are likely to be located in countries in the regions in which we operate.
- (b) We will not be liable for a breach of the APP if your Personal Information is mishandled in that jurisdiction. If your Personal Information is transferred to a jurisdiction which does not have data protection laws as comprehensive as Australia's, We will take reasonable steps to secure a contractual commitment from the recipient to handle your information in accordance with the APP.

8 Financial information relating to your credit cards

- (a) This information is never taken by us either through our Website or Software. If you are accessing our Services or a Product made available through a third-party hosting site, you should satisfy yourself as to the security of that site as that site it is not controlled by us.



9 Financial information about your direct debit

- (a) When you have agreed to set up a direct debit arrangement, the information you have given to us is passed to our own bank for processing per our instructions. We do keep a copy.

10 Cookies

- (a) Cookies are small text files that are placed on your computer's hard drive through your web browser when you visit any website. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site.
- (b) Like all other users of cookies, we may request the return of information from your computer when your browser requests a web page from our server. Cookies enable our web server to identify you to us, and to track your actions and the pages you visit while you use our website. The cookies we use may last for a single visit to our site (they are deleted from your computer when you close your browser), or may remain on your computer until you delete them or until a defined period of time has passed.

How to contact Us about privacy

If you have any queries, or if you seek access to your Personal Information, or if you have a complaint about Our privacy practices, you can contact Us on:

admin@seachangepaeds.com.au

Dated: 29 Feb 2024