

EHS – QMS – POL

Privacy Policy



Document History

Document Control

Date	Person Responsible	Reason for Change	Revision Number
01.05.2020	John Hall	Legal Requirement and wording drafted by EHS lawyers	1.0
12.12.2022	Fran Kavanagh	Review	1.1
18.09.2023	Fran Kavanagh	Review and update to DMF format	1.2
01.11.2024	Fran Kavanagh	Review	1.3
03.10.2025	Fran Kavanagh	Rebrand document	1.4

Document Owner

Name	Position
Fran Kavanagh	QA Manager

Approver

Name	Position
John Hall	CEO

1. Purpose

Executive Health Solutions Pty Ltd (**we, us, our**) recognises the importance of protecting your privacy. We are bound by, and committed to complying with, our obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles within the Privacy Act. This Privacy Policy explains how we handle your personal information and how you can contact us if you want to access or correct any personal information that we hold about you.

2. Terms and Definitions

Personal Information	Information that can be used to identify an individual such as name, date of birth, email address, phone number or postal address
Non-Personal Information	Data that does not identify an individual used for statistical or analytical purposes
Opt-Out	A mechanism that allows users to choose not to receive marketing information

3. Roles and Responsibilities

This policy applies to employees, agents, and contractors (including sub-contractors and temporary contractors), third-party service providers of EHS and all its related entities, collectively referred to in this policy as 'workplace participants'.

Document Owner	Responsible for managing the document review process. The Document Owner must ensure all relevant stakeholders have been involved in the review, as appropriate. The Document Owner is responsible for ensuring the latest version of the document is available to relevant workplace participants after final approval from the Document Approver.
Document Approver	Responsible for approving the content and final version of a document prior to its release. The approval must be recorded in a relevant location, such as meeting records, via email or other mechanisms which are known to all participants within EHS.
Department Managers	Responsible for ensuring all documentation under their area of responsibility is relevant, available, and accessible.
EHS Staff	Responsible for implementing the EHS policies and procedures. EHS staff are expected to keep abreast of the latest policies and procedures, as applicable to them.

4. Privacy Policy

4.1 Personal Information

Personal information is information about you, or which identifies you, like your name, contact details, and our records about you. It includes sensitive information about you, such as your health information.

Collection of your personal information

We collect personal information from our clients and customers and other individuals. We only collect personal information by lawful and fair means. We will collect your personal information in different ways through our interactions with you, such as:

- when you attend a scheduled assessment or program such as a health assessment, health management program or those associated with ongoing care;
- through online and paper-based questionnaires we provide to you;
- through our online portal or digital platforms;
- where we, or our agents, communicate with you in person, by telephone, mail, or email;
- when you submit a form or provide information when accessing our products and services; or
- when you apply for a job with us.

In some cases, where it is unreasonable or impracticable to obtain your personal information directly from you, we will seek to obtain it from others, such as your employer, health insurance funds, medical practitioner, a government agency, or employment recruitment agencies.

We collect the following personal information in respect of:

- *our clients (including prospective clients):* their name, age, date of birth, contact details, referrals, pathology results, clinical history and other relevant circumstances and health assessments, employer, payment and related information (Medicare and other health identifiers, private health insurance and billing details) and other information necessary to provide our products and services;
- *medical practitioners:* their name, contact details, information relevant to providing product and services to referred clients, and billing information;
- *our contractors, service providers and business associates:* their name, contact details and information relevant to obtaining third party services or providing our services; and
- *job applicants:* their name, contact details, job applications, references and other information relevant to assessing applicants.

We will only collect your sensitive information where it is reasonably necessary for one or more of our functions or activities as set out below.

Wherever it is lawful and practical to do so, you may interact with us on an anonymous or pseudo-anonymous basis. However, we may not be able to provide you with our products or services if you refuse to provide us with your personal information.

Why we handle your personal information

We collect personal information from you so that we can provide you with a high standard of customer service in relation to our products and services.

We collect, hold, use and disclose your personal information for the following purposes:

- to interact with you;
- to provide you with our products and services;
- to maintain our business records;
- to provide you with information about products and services that may be of interest to you;
- for any purpose required or permitted by law;
- for any purpose disclosed to you and to which you have consented;
- for any purpose that you would otherwise reasonably expect (and, in the case of your sensitive information, is directly related to the primary purpose for which it was collected); and
- otherwise, to run our business.

Disclosing your personal information

We will not sell or rent your personal information. We may disclose your personal information to others, such as:

- if your employer or prospective employer has arranged for us to provide you with our products and services, your employer, but only in relation to:
 - pre-employment assessments where you consent to the release of this personal information
 - data aggregated with that of other individuals (including statistical data), without reference to individuals and without any identification of individuals; and
 - identifying personal information with your prior written consent in each instance
- your agents or representatives, including your medical practitioner(s) with your consent;
- our employees, contractors and agents that we engage to provide you with our products and services, including any health coach that we assign to you;
- your insurer (if any) responsible for paying for the provision of our goods and services to you, but only in relation to insurance medical findings and only with your consent;
- our service providers, including IT services, and mailing houses;
- our related companies and other business partners;
- our professional advisers, including lawyers, accountants and auditors;
- Medicare, Department of Veterans' Affairs, workers compensation insurers, transport accident insurers, and private health insurance funds in relation to payment for our services (if applicable); and
- government, regulatory and law enforcement authorities.

Notwithstanding the above, health promotion information about you, your individual health assessments and health information obtained from you through our online portal and our questionnaires or through our health coaching service are only shared with you, and not your employer or prospective employer. We do not disclose any government-related identifiers to third parties except if reasonably necessary to verify your identity or as otherwise permitted by law.

Disclosure to Overseas Recipients

We do not disclose your personal information to third parties located outside Australia without your request and consent.

4.2 Accessing and Correcting your Personal Information

You have rights under privacy legislation to obtain copies of the personal information that we hold about you. If you would like to access the information that we hold about you, you can contact us on the details provided below.

If we refuse access, we will provide you with a written notice explaining our reasons.

We may ask you to pay our reasonable costs of providing you with access to the personal information that we hold about you. We seek to ensure that the personal information that we handle is accurate, up-to-date and complete. We encourage you to contact us on the details provided below to seek correction of the personal information we hold about you if you believe that it is inaccurate, outdated, incomplete, irrelevant or misleading. We are not obliged to correct any of your personal information if we do not agree that it requires correction and we may refuse to do so. If we refuse, we will provide you with a written notice explaining the basis for our refusal.

Security of your personal information

We hold your personal information in both paper-based and electronic files. Electronic information is stored on a secure information technology environment with password protection and operational control. Our physical premises are electronically secure, and our employees and agents are obliged to treat any personal information held by us confidentially. We seek to ensure that personal information that we hold is protected from misuse, interference and loss caused by unauthorized access, modification or disclosure.

4.3 Website

When you use our website, for each visitor to the site, we collect non-personally identifying information, including browser type, version and language, operating system, pages viewed while browsing our website, page access times and referring website address. This collected information is used solely internally for the purpose of gauging visitor traffic, trends and delivering personalized content to you while you are at our website.

4.4 Marketing

We may use or disclose the personal information that we hold about you, including your contact details, to provide you with information about products and services that may be of interest to you. You may opt out of receiving all or certain types of marketing information from us at any time by contacting us on the details provided below or, in the case of electronic direct marketing, by clicking the 'unsubscribe' button.

4.5 Questions and Complaints

If you have any questions, concerns or complaints about the way in which we have handled your personal information, including if you believe we have not complied with our obligations under the Privacy Act, please contact us on the "Contact" link on our website, or contact us using the details set out below so that we can investigate it:

To the attention of the Privacy Officer, Level 6 32 Martin Place, SYDNEY NSW 2000 (Telephone: (02) 9384 0600)

We will investigate your complaint and will advise you of the outcome of our investigations in writing. You may also lodge a complaint with the Office of Australian Information Commissioner by calling 1300 363 992 or sending an email to enquiries@oaic.gov.au.

4.6 Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. Any updates will be posted on our website, and the revised policy will be effective immediately.

5 Evaluation

EHS shall annually audit their document control processes against this policy, their procedure, and Document Index to ensure the documents are approved and current. If there is a material change to the policy, it will be submitted for approval as a new revision.