

DIGITAL HEALTH PTY LIMITED PRIVACY POLICY

Last Updated: February 2018

1. General

Digital Health CRC Pty Limited (“DH”, “we”, “us”, “our”) provides software and consulting services that improve the integrity and efficiency of health systems. DH CRC owns and operates the website, <http://www.digitalhealthcrc.com> and other affiliated websites (together, the “Website”).

Aside from the Website, DH CRC also owns and operates software which analyses health information.

DH CRC is dedicated to protecting your privacy in accordance with the *Privacy Act 1988* (Cth) (the **Act**) and the Australian Privacy Principles (the **APPs**). This Privacy Policy sets out how DH CRC manages the personal information we collect, hold, use and disclose about you when you access and use the Website.

2. Changes to the Privacy Policy

DH CRC reserves the right to amend this Privacy Policy from time to time. We will notify you of any changes to the Privacy Policy by revising the last updated date on the top of this policy and publishing the revised Privacy Policy on our Website at <https://www.digitalhealthcrc.com/privacy>. We encourage you to check our Privacy Policy regularly for updates and amendments.

3. Collection of Information from You

We may directly collect personal or sensitive information which you have provided to us. We may directly collect your personal information in a variety of ways, for example:

- when you visit or use our Website or services;
- when you engage with DH CRC on social media platforms;
- when you apply for a job at DH CRC;
- when you sign up to a mailing list or to receive newsletters; or
- when you contact us.

The types of personal information we may directly collect from you includes (but is not limited to) your name, e-mail address, postal address or telephone number.

You are under no obligation to provide us with your information and you may be able to visit our Website and deal with us anonymously or by pseudonym. However, if you choose not to provide us with certain information, we may not be able to provide you with the full services that you seek.

4. Collection of Information from Third Parties

DH CRC collects personal information about health care issues and interactions from health insurance companies, healthcare providers, healthcare professionals, government agencies and/or hospitals.

DH CRC also collects data about health companies. This data does not include names or street addresses or has been de-identified. However, because the information is potentially identifiable, we treat all data as 'personal information' and apply privacy protections accordingly.

Please note that this Privacy Policy applies solely to the management of personal information by DH CRC and through the DH CRC Website and services. DH CRC is not responsible for the privacy practices and procedures of third parties who may have otherwise collected and/or provided your information to us. We strongly encourage you to read the privacy policies of, or contact these third parties directly for further information about their privacy practices.

5. How we Use Personal Information

Personal information and other data is supplied to us so that we might analyse help reduce healthcare costs and improve outcome for patients and society. Our analysis helps to:

- empower consumers
- improve understanding and management of health risks of individuals and communities
- support clinical practice
- improve system efficiency and access to quality care,
- building and enhancing businesses to provide high value jobs and solutions in a growing global market, and
- Developing Australia's future digital Health workforce.

We only use personal information and other data in order to provide analysis and reports back to the health insurance companies, healthcare professionals and providers, government agencies and/or hospitals who supplied the data to us. We do not use personal information or other data for any other purposes.

6. Do we Disclose personal information to third parties?

DH CRC may disclose personal information to third parties which may include (without limitation):

- our related entities and affiliates or business partners;
- third party service providers, contractors, suppliers, vendors who we may engage to assist us in the management of our business and the provision of our services to you and our clients, in the management of our databases and in the operation of our Website. For example, business support services such as website hosting services and information storage services;
- third party service providers who assist us in the distribution of marketing and promotional materials and email updates about the Website and our services, for example mailing houses;
- to government or regulatory bodies and agencies, law enforcement bodies (such as the police), courts of law, if required or authorised to do so by law. For

example, in response to a subpoena or legal order, to investigate, prevent or take action regarding suspected illegal activities, fraud or potential threats or to exercise legal rights or defend against claims such as intellectual property infringement; or

- as otherwise permitted or required by law.

7. Do we use cookies on our Website?

DH CRC may also collect, use and disclose other, non-personal information on our server log files, including, for example, your IP address, browser type and your usage of our Website. We may collect this information using cookies or similar technologies.

When you visit, or use the Website, your web browser may store cookies (files of data) on your computer that may be retrieved when you revisit the Website in order to store your preferences in navigating and using our Website so as to customise your experience on our Website. These cookies do not contain personal information, although they may record and send us your IP address which allows our servers to recognise your preferences on our Website. You may delete or prevent cookies from being saved on your computer by changing your internet browser settings and may still use and visit our Website without accepting the cookies. However, if you reject or delete the cookies, you may not be able to take full advantage of certain features on our Website.

We may also collect or use this non-personal information to help us monitor and analyse our Website usage and traffic and this non-personal information may be disclosed to third parties who assist us in conducting the analysis. This information is disclosed in aggregate and to the fullest extent possible, will be de-identified before it is disclosed to third parties. However, please be aware that your IP address may be linked to any personal information that you submit.

8. DH CRC takes steps to secure your personal information

DH CRC is committed to protecting the security of your personal information and we take all reasonable precautions to secure and protect the integrity of personal information from misuse, interference and/or loss and unauthorised access, modification and/or disclosure.

DH CRC uses firewalls and secure server software (**SSL**) to encrypt information before it is sent to us by our clients. However, any such provision of information is at your own risk or the responsibility of the third parties who provide us with personal information for the purposes of providing our services to them.

9. DH CRC holds your information on secure servers

We use a top tier, third party data hosting provider for 'cloud' hosting. Servers in Australia will host all data for Australian clients. Servers in the US will host all data for US customers.

The servers on which personal information are stored are kept in a controlled environment. While we take reasonable efforts to guard your personal information,

no security system is impenetrable and due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others such as hackers.

10. Third party links

Our Website may contain links to or from other third party websites. These other websites are not subject to this Privacy Policy or our privacy practices and procedures and we are not responsible for the content or privacy practices of these third party websites. This Privacy Policy applies solely to the management of personal and sensitive information through the conduct of the DH CRC Website and services. We strongly encourage you to read the privacy policies of these third party websites or contact these third parties directly for further information about their privacy practices.

11. How can you access or correct your personal information?

DH CRC takes such steps as are reasonable to ensure that the personal information we collect about you is accurate, up-to-date and complete. However, we rely on the accuracy of the personal information that is provided to us by you or by third parties.

You may seek access to, or request the correction of, the personal or sensitive information that we may hold about you by submitting a request for access or correction of your personal or sensitive information by contacting us at privacy@digitalhealthcrc.com and providing us with details of your request.

Once we receive your request, we will endeavour to respond to that request within a reasonable period after your request is made. There are some exceptions, specified by law, where we may refuse your requests. If one of these circumstances applies, we will provide you with a written explanation of the reasons for the refusal, unless it would be unreasonable to do so

12. How can you make a complaint about a breach of your privacy?

If you have any concerns about our handling or treatment of your personal or sensitive information or if you believe that your privacy has been breached, please contact us by sending us an email at privacy@digitalhealthcrc.com or using the contact details below, and set out the nature of your complaint.

We will investigate your complaint and endeavour to provide you with our response within a reasonable time of receiving your complaint. If after receiving our response, you still consider that your privacy complaint has not been resolved, you may refer your complaint to the Australian Privacy Commissioner at <http://www.oaic.gov.au/>.

13. Contact Us

If you have any other questions or comments about our privacy practices or this Privacy Policy, please contact us at:

DH CRC Pty Limited

Level 3, 55 Harrington Street

The Rocks, Sydney, NSW 2000

AUSTRALIA

Email: privacy@digitalhealthcrc.com