

PRIVACY POLICY

This Privacy Policy covers the privacy practices that Advanced Professional Systems Pty Ltd., (ACN 133 412 030) trading as Medilink, employs when providing customer support, consulting, hosting or other services to its customers.

Medilink respects and upholds the right to privacy protection under the Australian Privacy Principles contained in the Privacy Act 1988 as amended.

For further details go to the government web site legislation.gov.au/Details/C2018C00292.

Protecting your Privacy and Private Information is our Priority. Medilink is committed to ensuring the security and protection of the personal information that we process and provide a compliant and consistent approach to data protection. We maintain effective and robust data protection processes and mechanisms, compliant with existing laws, data protection requirements and the Australian Privacy ACT and Principles (APPs).

This Privacy Policy details how we will maintain your privacy and handle your personal information in accordance with the APPs. This policy applies to all information which Medilink may be provided access to or which may be collected in order to provide its services to you, a customer.

Medilink will only access, collect and / or use customer information and services data reasonably necessary for the provision of its services to you.

Customer information is any information or an opinion that Medilink may collect from your use of its services which can identify an individual, or by which an individual's identity can be reasonably determined regardless of whether the information or opinion is true or not.

Customer information collected by Medilink may include but is not limited to:

- License purchasers name(s), Subscriber name and / or practice name;
- Primary contacts including name, position, practice, office and postal address, email address and general contact details such as phone, facsimile and mobile telephone numbers;
- Your position (such as a specialist, practice manager, receptionist, IT consultant or otherwise);
- Your practice type (such as general practitioner, medical specialist, allied health professional or any combination of these types.);
- The identification, type and number of devices requiring access to Medilink software products;
- User names and email addresses; and
- Your billing information including your bank account details; and
- Any other information you provide to Medilink.

What is services data?

Services data is data that resides on Medilink, customer or third party systems to which Medilink is provided access to in performance of its services.

Services data Medilink may be provided access to may include, but is not limited to:

- The health or a disability of an individual;
- An individual's expressed wishes about the future provision of health services;
- Health services(s) provided to an individual;
- Medical information such as dietary requirements, medical history, general practitioner, Medicare/private health fund details; and
- Additional information you provide access to Medilink.

How does Medilink collect customer information and services data?

Medilink collects customer information and services data only by lawful and fair means.

Primarily, customer information and services data is provided to Medilink by you. Customer information and services data may also be provided to Medilink from time to time, by other third parties.

Sensitive information

In certain circumstances we may collect sensitive information about you. This information is reasonably necessary for us to do business with you and carry out our business activities.

We will only collect sensitive information (as that term is defined under the Privacy Act) if you voluntarily provide it to us or if you otherwise consent to us collecting it. We will only collect sensitive information about you from you. If you provide us with sensitive information, this will constitute your consent.

Consequences if customer information is not collected

If Medilink require particular information about you which has not been supplied in the general course of information collection, you will be contacted directly and requested to supply that customer information. If some or all of the customer information relating to you is not collected by Medilink, it may be that Medilink is not able to provide its services to you.

Use and disclosure of customer information and services data by Medilink

Medilink's purposes in collecting, holding, accessing and using customer information and service data is to enable it to provide its services to you including:

- Provide products or services that have been requested;
- Communicate with you;
- Administer our relationship with you;
- Discuss with you potential updates or advances to our products and services;
- Inform you of other Medilink products and community news;
- Address any query, feedback or complaints you may have and to record your marketing and communication preferences;
- Fulfil any legal and regulatory obligations;
- Contact you or deal with you for any other reason; and / or
- Fulfil any other purpose that was made clear at the time of collecting the personal information.

Services data may be accessed by Medilink and used to fulfil the requirements specified in the relevant Customer Service Agreement.

If Medilink holds customer information about you that was collected for a particular purpose, Medilink will not use or disclose the information for another purpose without your consent, unless you would reasonably expect Medilink to use or disclose the information for the secondary purpose.

Customer information and services data will continue to be held by Medilink after you are no longer a customer of Medilink, for the purpose of record management and if required to do so by any regulatory authorities or if required by law.

Marketing and Research

You consent and agree that Medilink may from time to time use customer information collected by it for marketing and research purposes related to Medilink. This may include (but is not limited to) sending updates and information related to Medilink or its activities. Where this is the case your customer information will not be disclosed to anyone else.

There may be circumstances in which Medilink will need to contact you with information that is necessary to provide its services.

There may be certain times when Medilink wishes to provide customer information collected to third parties or where customer information is provided to third parties only for the purpose of outsourcing relevant functions of provision of services to you. Third parties could include but is not limited to government and regulatory authorities as required or authorised by law.

Legal Requirements

If Medilink reasonably believes that the use or disclosure of customer information and/or services data is reasonably necessary for one or more enforcement related activities, it may be released to the relevant enforcement body.

Medilink may also be required to provide customer information and services data to comply with legal reporting, disclosure or other legal process requirements. Medilink reserves a right to disclose any customer information and/or services data it has access to if required by law or valid order of a court or other governmental authority, or if needed to protect the health and safety of Medilink employees, a customer's employees, or the general public.

Dealing with Unsolicited Customer Information

If Medilink receives customer information which it did not solicit, Medilink will, within a reasonable period after receiving the information, determine whether it is information that it could have been received under clause 4 of this policy.

If Medilink determines that it could not have collected the customer information under this Privacy Policy, Medilink will, as soon as practicable (and provided it is lawful and reasonable to do so), destroy that information or ensure that the information is de-identified.

If Medilink determines that it could have collected the customer information under clause 4, it may keep the information in accordance with this Privacy Policy.

Customer Information and Services Data Security

Medilink is committed to the protection of customer information and services data from unauthorised access. Medilink will take such steps that it considers to be reasonable in the circumstances to protect customer information and services data from misuse, interference and loss, unauthorised access, modification or disclosure, and will otherwise comply with the APPs.

Digitally stored customer information and services data are password protected. Passwords are only provided to those employees of Medilink who require access to the records in the course of their duties in providing customers of Medilink with its services.

More specifically, Medilink employees may require periodic access to services data to trouble shoot and monitor system functionality.

Destruction of Customer Information and Services Data

Where Medilink holds customer information and services data, and the information is no longer needed (or no longer required by law to be retained by Medilink), Medilink will take such reasonable steps in the circumstances to destroy the customer information and services data or to ensure that the information is de-identified.

Any files that are destroyed are done so through secure electronic destruction processes.

Cookies

“Cookies” are small data files that may be downloaded to your computer when you visit a website, which may be used to track your use of that website.

Cookies must be enabled in order to use web based software products offered by Medilink.

Medilink may use cookies from time to time to:

- Your usage of Medilink’ software products;
- Improve your experience on Medilink software products;
- Provide you with better service when you use Medilink software products;
- Authenticate your access to Medilink software products; and
- Recognise you when you return to Medilink software products.

You can adjust your internet browser to disable or warn you when cookies are used. However, disabling cookies will stop Medilink’ software products from functioning fully.

External Links

Software products offered by Medilink may from time to time contain links to other websites, and those third party web sites may collect information about you.

Medilink takes no responsibility for the content or privacy practices of other websites or their products that are linked to Medilink software products.

Data Analytics

Data Analytics is a service used by Medilink which tracks software products offered by Medilink and transmits that data in a form accessible to Medilink.

Medilink uses data analytics to collect information about the use of Medilink software products to monitor system performance, test systems and develop and implement upgrades to systems.

Medilink may use data collected by data analytics for the purpose of interpreting the usage of Medilink software products and to improve the software products.

Access to Customer Information and Services Data

You have the right under the Privacy Act to seek access to your customer information and services data held by Medilink. If you wish to exercise this right, or if you believe that the information is incorrect, incomplete or out of date, you should advise us in writing of the alleged error. We will respond to any such request within a reasonable period and Medilink will grant access provided the request does not fall under one of the exceptions to access stated in the APPs. Access may be denied where:

- To provide access would create a serious threat to the life, health or safety of an individual, or to public health or public safety;
- The access would unreasonably impact on the privacy of another;
- The request is frivolous or vexatious;
- The information relates to anticipated or actual legal proceedings and the individual would not be entitled to access the information in those proceedings; or
- Giving access would be unlawful.

Enquiries and Complaints

Information about the Privacy Act and the APPs is available from the Federal Privacy Commissioner. If you want to make a complaint about Medilink management of customer information and/or services data, wish to correct information held by Medilink or wish for further information please contact Medilink. You will be contacted about your complaint as soon as reasonably practicable and Medilink will attempt to resolve it with you.

If you are not satisfied with the outcome of your complaint, you may refer your complaint to the Office of the Australian Information Commissioner by contacting 1300 363 992 or by visiting the website oaic.gov.au

Changes to this Privacy Policy

We may make changes to this Privacy Policy from time to time to take account of changes to relevant laws and technology, changes to our business operations and practices and general changes to the external business environment.

A current copy of the Privacy Policy is maintained on our website at medilink.com.au.

Contact details

If you wish to contact Medilink in relation to any privacy related matter please use any of the following methods of contact:

Email: support@medilink.com.au

Phone: 1300 881 995

Address: PO Box 7296, East Brisbane QLD 4169