



HLS Healthcare Privacy Policy

HLS Healthcare Pty Ltd is committed to protecting the privacy of individuals' personal information by complying with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth). This Policy describes how HLS Healthcare Pty Ltd (ABN 21 773 032 945) handle personal information. Nothing in this Privacy Policy is intended to limit our obligations or permitted handling of personal information under privacy laws. For example, under the Privacy Act, we may rely on certain exemptions including in relation to employee records.

1. Collection of personal information - We may collect personal information about you in certain circumstances such as where you contact or transact with us. We collect current and historical personal information including information about your name, contact details, identification (eg, driver's license or passport you provide to us), organisational affiliations, positions held, forms submitted, payment details, enquiry/complaint details, details of any injury or safety incident on any of our sites. We collect the information that you provide in your communications and transactions with us, including records of any contact we have with you by telephone, email or online. We may also operate video and audio surveillance devices in our premises for purposes including security, training and dispute resolution. We collect personal information directly from you as well as from third parties including public sources, share registry service providers, information service providers and the parties with whom we exchange information as described here.

2. Use of personal information - The personal information that you provide to us may be used for business purposes relevant to our relationship with you. This may include but is not limited to: assessing and responding to your enquiries, requests and applications; fulfilling your orders; identifying other products and services that you might purchase; helping us improve our product and services offering; direct or other marketing of our products and services; market research; relationship management; injury and safety management and protecting our lawful interests. We may not be able to do these things without your personal information. For example, we may be prevented from delivering our products and services, communicating with you and/or improving our product and service offering. We may contact you on an ongoing basis by telephone, email, SMS or other means regarding your account or, subject to any legal restrictions, for debt collection.

3. Disclosure of personal information - We may exchange your personal information with our supplier for purpose of project detail and clarification, subcontractors, service providers, your guarantors (where applicable) and your representatives in the course of conducting our business. The types of service providers we engage include those that assist us with archiving, auditing, accounting, customer contact, legal, business consulting, banking, payment, debt collection, delivery, data processing, data analysis, information broking, research, investigation, insurance, website or technology services. We may also exchange your personal information with third parties

when undertaking joint promotions. Your personal information may be disclosed to third parties transacting with HLS Healthcare Pty Ltd in relation to our assets or businesses under an undertaking of confidentiality.

4. Security and Confidentiality - We implement various security measures to protect the security and confidentiality of your personal information, including taking reasonable steps to destroy or de-identify information that we hold about you when it is no longer required. We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers.

5. Recruitment - If you apply for a position with us, we may also collect information about your experience, character, qualifications and screening checks (including background, health, reference, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks). We collect, use and disclose your personal information to assess your application, conduct screening checks and consider and contact you about positions available. We may exchange your personal information with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers. Without your personal information we may not be able to further consider you for positions with us.

6. Personnel - This section applies to our current and former employees and contractors in addition to the recruitment section above. We may collect information relating to your current or former employment or engagement including information about your training, disciplining, resignation, termination, terms and conditions, emergency contact details, performance, conduct, use of our IT resources, payroll matters, union or professional/trade association membership, recreation, leave and taxation, banking or superannuation affairs. We are required or authorised to collect your personal information under various laws including the Fair Work Act, Superannuation Guarantee (Administration) Act and Taxation Administration Act. We collect, use and disclose your personal information for purposes relating to your employment or engagement with us including engagement, training, disciplining, payroll, superannuation, health and safety, administration, insurance (including Workers Compensation) and staff management purposes. We may exchange your personal information with your representatives (including unions) and our service providers including providers of payroll, superannuation, banking, staff benefits, medical services, surveillance (where permitted by law) and training services. Without your personal information we may not be able to effectively manage your employment or engagement. If a current or former employee makes a claim under the workers compensation law in any state or territory, proper processing, assessing and management of the claim will necessitate that information be collected and provided to and from statutory authorities and other entities under the legal obligations imposed by the applicable state or territory.

7. Credit Related Information – This paragraph applies in addition to (and without limiting) the other parts of this Policy in connection with all trading and customer accounts with us. If you are an individual credit applicant or customer of ours or if you are a guarantor for another credit customer (eg, a company you represent), we may collect consumer credit-related personal information about you. The types of credit-related personal information we collect include your name, sex, date of birth and three most recent addresses; driver's license number; employer; amount and type of

credit you have applied for; credit limits; terms relating to credit arrangements; confirmation of previous information requests to credit reporting bodies (“CRBs”) made by other credit providers, mortgage insurers and trade insurers; details of your current and previous credit providers; start and end dates of credit arrangements; permitted payment default information including information about related payment arrangements and subsequent repayment; any credit provider’s opinion that you have committed a serious credit infringement (acted fraudulently or shown an intention not to comply with your credit obligations); information about court judgments against you; publicly available information about your credit worthiness; insolvency information from the National Personal Insolvency Index; and any credit score or credit risk assessment indicating a CRB’s or credit provider’s analysis of your eligibility for consumer credit.

8. Online Activity – If you use www.hlshealthcare.com.au applications, social media profiles and online facilities (“Online Facilities”) being the HLS Healthcare Customer Portal, we may record information such as the date and time of your use of our Online Facilities, the pages/sections accessed and any information downloaded. This information is used for statistical, reporting, administration and maintenance purposes in relation to our Online Facilities. Our Online Facilities may use ‘cookies’ from time to time. Cookies are electronic files that allow our system to identify and interact more effectively with your device and software. The cookie helps us to maintain the continuity of your browsing session and remember your preferences when you return. In many cases this happens anonymously, however where you have clicked a link in an email we have sent you or you have logged in or provided personal information to our Online Facilities, we may associate the cookie with you. You can configure your browser software to reject cookies however some parts of our Online Facilities – Customer Portal may not have full functionality in that case. If you are considering sending us any other personal information through our Online Facilities – Customer Portal or other electronic means, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email, standard HTTP). We are subject to laws requiring us to protect the security of personal information once it comes into our possession.

9. Access, Correction and Further Queries - If you wish to find out more about our information handling practices, raise any privacy concerns or you wish to view or request amendment of your personal information, please do so in writing and send your query to admin@hlshealthcare.com.au or mail to the attention of the Office Manager, HLS Healthcare, 3/56 Norcal Road, Nunawading VIC 3131.

10. Notification of Changes - This Privacy Policy will be amended and updated from time to time. Any changes to this Policy will be notified by an announcement on our website. The date on the bottom of this page indicates when this Policy was last updated.

Last updated: July 2014