

## 1 Policy statement

Cabrini Technology Group (**Cabrini Technology**) - a division of Cabrini Health Limited (ABN 33 370 684 005; ACN 108 515 073 ) - incorporates, provides and implements world-class biomedical and Information & Communication Technology (**ICT**). Cabrini Technology supplies, installs, repairs, maintains and calibrates advanced health and IT equipment and consumables.

Cabrini Technology and its related bodies corporate (**Cabrini Technology, We, Us**) are committed to protecting the privacy of the personal information and sensitive information which we collect and hold.

Cabrini Technology provides ICT and related services across Australia and New Zealand as well as a range of healthcare equipment and consumables (**products**).

Cabrini Technology must comply with the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*, and other applicable privacy laws (including the *Health Records Act 2001 (Vic)*) (**privacy laws**) which govern the way in which we hold, use and disclose personal information (including your sensitive information).

The purpose of this Privacy Policy is to explain:

- (a) the kinds of information that Cabrini Technology may collect about you;
- (b) how Cabrini Technology collects and holds personal information;
- (c) the purposes for which Cabrini Technology collects, holds, uses and discloses personal information;
- (d) how you can access the personal information Cabrini Technology holds about you and seek to correct such information; and
- (e) the way in which you can complain about a breach of your privacy and how Cabrini Technology will handle that complaint.

## 2 Definitions

In this Privacy Policy the following terms have the following meanings:

**health information** is:

- (a) personal information or an opinion about:
  - (i) the health, including an illness, disability or injury (at any time), of an individual;
  - (ii) an individual's express wishes about the future provision of health services for themselves; or
  - (iii) a health service provided, or to be provided, to an individual;
- (b) other personal information collected to provide, or in providing, a health service to an individual;

- (c) other personal information collected in connection with the donation, or intended donation, by an individual of his or her body parts, organs or body substances; or
- (d) genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

**personal information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

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

**sensitive information** means:

- (c) personal information or opinion about an individual's:
  - (i) racial or ethnic origins;
  - (ii) political opinions or political associations;
  - (iii) philosophical beliefs or religious beliefs or affiliations;
  - (iv) membership of a professional or trade association or union;
  - (v) sexual preferences or practices; or
  - (vi) criminal record; or
- (d) health information about an individual;
- (e) genetic information about an individual that is not otherwise health information; or
- (f) biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

### **3 Collection and use of personal information**

#### **3.1 Types of personal information collected by Cabrini Technology**

The types of personal information we collect from you depend on the circumstances in which the information is collected.

- (a) Customers, clients and research participants

Cabrini Technology collects information which is necessary to provide its customers and clients with products or services. This includes collecting personal information such as your name, address and contact details.

If you purchase products or services from Us, Cabrini Technology may also collect certain transactional information and financial details to securely process the purchase.

In some cases, if we are assisting in providing a health-related service to your patients, Cabrini Technology may collect the health information of those patients if that is necessary to provide the required products or services.

- (b) Employees, students and contractors

Cabrini Technology collects information from you which is necessary to properly manage and operate its business. This may include collecting personal information such as your name, address and contact details, professional experience, qualifications and past employers, emergency contact, vaccination and health information and any other information which may be necessary to appropriately conduct our business.

- (c) Job applicants

Cabrini Technology collects information from you which is necessary to assess and engage job applicants. This includes collecting personal information such as your name, address and contact details, professional experience, qualifications, references and past employers, and any other information which is necessary to process your job application.

- (d) Web site users

When you use a Cabrini technology web site, we may collect information about your website usage such as the IP address you are using, the name of your Internet service provider, your browser version, the web site that referred you to us, the pages you request, the date and time of those requests and the country you are in.

### 3.2 How we collect personal information

We will usually collect your personal information directly from you, however sometimes we may need to collect information about you from third parties, such as:

- (a) another ICT provider;
- (b) another health service provider;
- (c) past employers and referees; and
- (d) related entities.

We will only collect information from third parties where:

- (e) you have consented to such collection;
- (f) such collection is necessary to enable us to provide you with appropriate ICT services or healthcare equipment and consumable products;
- (g) such collection is reasonably necessary to enable us to appropriately manage and conduct our business; or
- (h) it is legally permissible for us to do.

Cabrini Technology will only collect information which is necessary to provide you with products or services, or to appropriately manage and conduct our business.

### 3.3 How Cabrini Technology uses your personal information

Cabrini Technology only uses your personal information for the purpose for which it was collected by Cabrini Technology (**primary purpose**), unless:

- (a) there is another purpose (**secondary purpose**) and that secondary purpose is directly related to the primary purpose, and you would reasonably expect, or Cabrini Technology has informed you, that your information will be used for that secondary purpose;
- (b) you have given your consent for your personal information to be used for a secondary purpose; or
- (c) Cabrini Technology is required or authorised by law to use your personal information for a secondary purpose (including for research and quality improvements within Cabrini Technology).

For example, Cabrini Technology may use your personal information to:

- (d) provide products or services to you;
- (e) provide any related products or ongoing services to you;
- (f) appropriately manage our business, such as assessing insurance requirements, conducting audits, and undertaking accreditation processes; and
- (g) assist it in running our business, including quality assurance programs, billing, improving its services, implementing appropriate security measures, conducting research and training personnel; and
- (h) effectively communicate with third parties as required, including telecommunications carriers or your other ICT or health service providers.

If you have applied for a position with Cabrini Technology, we may exchange some or all of your personal information with your referees, police, Centrelink and recruitment consultants for appropriate purposes relating to considering your application (including checking your criminal record where permitted by law).

### **3.4 Complete and accurate details**

Where possible and practicable, you will have the option to deal with Cabrini Technology on an anonymous basis or by using a pseudonym. However, if the personal information you provide us is incomplete or inaccurate, or you withhold personal information, we may not be able to provide the products, services, or support to you are seeking, or deal with you effectively.

### **3.5 CCTV**

Cabrini Technology uses camera surveillance systems (commonly referred to as CCTV) for the purposes of maintaining safety and security of its customers, clients, personnel, visitors and other attendees. Those CCTV systems may also collect and store personal information and Cabrini Technology will comply with all privacy legislation in respect of any such information.

## **4 Disclosing your personal information**

### **4.1 Disclosure of your personal information**

Cabrini Technology will confine its disclosure of your personal information to the primary purpose for which that information has been collected, or for a related secondary purpose.

This includes when disclosure is necessary to provide products or services to you, assist us in running our organisation, or for security reasons.

We may provide your personal information to:

- (a) third parties contracted to provide services to Cabrini Technology, such as entities contracted to assist in providing ICT services or delivering products;
- (b) research institutions and sponsors with which Cabrini Technology collaborates;
- (c) anyone authorised by you to receive your personal information (your consent may be express or implied); and
- (d) anyone Cabrini Technology is required or permitted by law to disclose your personal information to, which may include the police and the Privacy Commissioner.

#### **4.2 Disclosure to External Service Providers**

Where permissible under the privacy laws, we may disclose personal information to external service providers who may use, process and store that information overseas.

### **5 Data storage, quality and security**

#### **5.1 Data quality**

Cabrini Technology will take reasonable steps to ensure that your personal information which is collected, used or disclosed is accurate, complete and up to date.

#### **5.2 Storage**

All personal information held by Cabrini Technology is stored securely in either hard copy or electronic form.

Personal information that is captured and stored electronically by Cabrini Technology staff is stored on our centralised, onsite computer systems or on secure cloud-based servers. Only authorised staff have access to these systems. This access is monitored in accordance with Cabrini Technology's policies and procedures.

#### **5.3 Data security**

Cabrini Technology strives to ensure the security, integrity and privacy of personal information, and will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Cabrini Technology reviews and updates (where necessary) its security measures in light of current technologies.

#### **5.4 Online transfer of information**

While Cabrini Technology does all it can to protect the privacy of your personal information, no data transfer over the internet is 100% secure. When you share your personal information with Cabrini Technology via an online process, it is at your own risk.

There are ways you can help maintain the privacy of your personal information, including:

- (a) always closing your browser when you have finished your user session;
- (b) always ensuring others cannot access your personal information and emails if you use a public computer; and
- (c) never disclosing your user name and password to third parties.

## 6 Use of cookies

A 'cookie' is a small data file placed on your machine or device which lets Cabrini Technology identify and interact more effectively with your computer.

Cookies, which are industry standard and are used by most web sites (including those operated by Cabrini Technology), can facilitate a web site user's ongoing access to and use of a site. They allow Cabrini Technology to customise our website to the needs of our users. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. However, cookies may be necessary to provide you with some features of our on-line services via the Cabrini Technology website and our websites may not function properly if cookies have been turned off.

## 7 Links to other sites

Cabrini Technology may provide links to third party websites. These linked sites may not be under our control and Cabrini Technology is not responsible for the content or privacy practices employed by those websites. Before disclosing your personal information on any other website, we recommend that you carefully read the terms and conditions of use and privacy statement of the relevant website.

## 8 Accessing and amending your personal information

You have a right to access your personal information which Cabrini Technology holds about you. If you make a request to access your personal information, you will need to submit a written enquiry via our [contact us page](#).

We will ask you to verify your identity and specify the information you require. A fee may be charged for this service.

You can also request an amendment to any of your personal information if you consider that it contains inaccurate information.

You can contact Cabrini Technology about any privacy issues via the same link.

While Cabrini Technology aims to meet all requests for access to personal information, in a small number of cases and where permitted to do so by law, Cabrini Technology may not give access or may do so only under conditions.

Subject to applicable laws, Cabrini Technology may destroy records containing personal information when the record is no longer required by Cabrini Technology.

## 9 Complaints

If you have a complaint about Cabrini Technology information handling practices or consider we have breached your privacy, you can lodge a complaint with:

- (a) Cabrini Technology using the [contact us page](#); or
- (b) the Office of Australian Information Commissioner at 1300 363 992 or [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

Cabrini Technology deals with all complaints in a fair and efficient manner.

## 10 General

Cabrini Technology reserves the right to amend this privacy policy at any time by publishing the amended policy on its website.

If you do not consent to Cabrini Technology collecting, using or disclosing your personal information, Cabrini Technology may be unable to provide its services to you.

## 11 Review

This Privacy Policy will be reviewed every two years or as needed. It will be reviewed in accordance with Cabrini Technology's document control procedure and process.