



## PRIVACY AND PERSONAL DATA PROTECTION POLICY

### 1. Introduction

In its everyday business operations, we make use of a variety of data about identifiable individuals, including data about:

- Current, past and prospective staff
- Clients/ vendors
- Users of its websites
- Subscribers
- Other stakeholders

In collecting and using this data, the organisation is subject to a variety of legislation controlling how such activities may be carried out and the safeguards that must be put in place to protect it.

The purpose of this policy is to establish standards of privacy, dignity and confidentiality in the agency's dealings with prospective, current and past users (the client) of the agency's services.

The agency is committed to ensuring that all clients of the agency have the same level of privacy, dignity and confidentiality as is expected by the rest of the community.

This control applies to all systems, people and processes that constitute the organisation's information systems, including board members, directors, employees, staff, suppliers and other third parties who have access to our systems.

### 2. Scope

This policy relates to staff, contractors, families/guardians, and Board members of 24/7 Nursing and Medical Services and 24/7 Contact Solutions (hereafter referred to as '24/7').

### 3. Legislation

24/7 respects the right to privacy and is committed to safeguarding the privacy of our clients and website visitors. We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth), the Privacy & Personal Information



Protection Act 1998 (NSW), the Privacy and Personal Information Protection Regulation 2014 (PIIP Regulation) and the Health Records and Information Privacy Act 2022 (NSW). This policy sets out how we collect and treat Personally Identifiable Information (PII).

This privacy statement declares the intentions of the organisation in relation to client information and data, how PII is stored, how clients can access this information and the purposes for which personal information is used and disclosed.

24/7 privacy statement includes sections on the following areas:

- Collection of personal information
- How we collect personal data
- Use of personal information
- Disclosure of personal information
- Security of personal information
- Access to personal information
- Complaints about privacy
- Changes to the privacy policy
- Website

#### **4. Collection of Personal Information**

24/7 will, from time to time, collect, receive and store PII entered onto our website or provided to us directly or given to us in other forms.

The agency will:

- Only collect information about the client that can be shown to be directly relevant to effective service delivery and the agency's duty of care responsibilities.
- Seek the written consent of the client or family prior to obtaining information from any other source.
- Seek the written consent of the client or family prior to releasing information to any other source.
- Ensure that personal information is stored securely and is not left on view to unauthorised agency staff or the general public.
- Ensure that only those agency staff who need access to the above information will be granted access.



- Advise the client and family of the nature of the personal information that is held by the agency about the client.
- Advise the client and family of their right to view the information that the agency keeps in respect of the client.
- Ensure that personal information about a client is only held by the agency as long as it remains relevant to the delivery of effective services and the agency's duty of care obligations.

Promptly investigate, remedy and document any consumer grievance regarding privacy, dignity or confidentiality.

## **5. How We Collect Your Personal Information**

24/7 collects PII in a variety of ways, including when people interact with us electronically or in person, when people access our website and when we provide our services. We may receive PII from third parties. If we do, we will protect it as set out in this Privacy Policy.

## **6. Use of your Personal Information**

24/7 may use PII collected to provide clients with information, updates, and our services. We may also notify you of new and additional services and opportunities that are available. We may use personal information to improve our services and better understand the needs of individuals.

24/7 may contact individuals by a variety of measures including, but not limited to telephone, email, SMS or mail.

## **7. Disclosure of PII**

We may disclose PII to any of our employees, managers, insurers, professional advisers, agents, suppliers, or subcontractors insofar as reasonably necessary for the purposes set out in this Policy.

PII is only supplied to a third party when it is required for the delivery of our services and has been discussed with the client.

We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, or warrant, in the course of a legal proceeding or in response to a law enforcement agency request.



We may also use PII to protect the copyright, trademarks, legal rights, property or safety of 24/7 Nursing and Medical Services, its clients or third parties.

Information that we collect is only stored, processed, or transferred within Australia.

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

By providing us with PII, individuals consent to the terms of this Policy and the types of disclosure covered by this Policy. Where we disclose personal information to third parties, we will request that the third party follow this Policy regarding handling personal information.

## **8. Security of your Personal Information**

24/7 is committed to ensuring that the information provided to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure. This includes standard implementation of cloud based end to end encryption on the applications and platforms that we use.

The transmission and exchange of information is carried out at your own risk.

We cannot guarantee the security of any information that is transmitted to us or received from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the PII that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

## 9. Requests

Individuals may request details of PII that we hold about them in accordance with the provisions of the legislation in section 1 of this policy. This includes requests for amendment, correction, erasure, withdrawal or modification of consent to collect, or a copy of the information held by 24/7. This information will be provided within a reasonable time frame, free of charge, and an initial response provided within 30 days. In the case of PII for which we are a Processor, and not the Controller, requests will be forwarded to the controller.

If an individual would like a copy of the information, which we hold about them or believe that any information we hold on them is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at [Info@247nursing.com.au](mailto:Info@247nursing.com.au).

We reserve the right to refuse to provide you with information that we hold, in certain circumstances set out in the legislation listed in section 1 of this policy.

### *a. Complaints about privacy*

If you have any complaints about our privacy practices, details of the complaint should be sent to [Info@247nursing.com.au](mailto:Info@247nursing.com.au). We take complaints very seriously and will respond shortly after receiving written notice of the complaint. We endeavour to respond to all complaints within 30 business days.

### *b. Changes to Privacy Policy*

Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board.

### *c. Website*

#### When you visit the 24/7 website

When you come to our 24/7 Nursing [website](#), and Contact Centre [website](#) we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

#### *i. Cookies*



We may from time-to-time use cookies on our website. Cookies are very small files that a website uses to identify a user when they come back to the site and to store details about their use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies, but individuals can choose to reject cookies by changing browser settings. However, this may prevent the user from taking full advantage of our website. Our website may from time-to-time use cookies to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third-party services such as Google AdWords. These ads may appear on this website or other websites visited.

#### *ii. Third-party sites*

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for individual convenience only. Links to third-party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that 24/7 is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personally identifiable information.

### **10. Data Protection Officer**

A defined role of a Data Protection Officer (DPO) has been established to oversee this Policy. Any questions or queries regarding PII can be addressed to [Info@247nursing.com.au](mailto:Info@247nursing.com.au). We endeavour to respond to all complaints within 30 business days.

### **11. Breaches**

It is a requirement of the Privacy Act 1988 Notifiable Data Breaches (NDB) Scheme that when an organisation or agency the [Privacy Act 1988](#) covers has reasonable grounds to believe an eligible data breach has occurred, they must promptly notify any individual at risk of serious harm. They must also notify the Office of the Australian Information Commissioner (OAIC). Breaches must be handled in accordance with the 24/7 Personal Data Breach Notification Procedure (MP-IS-07).



A handwritten signature in black ink, appearing to read "Joyce".

01.11.2023

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Signed: **Evelyn Joyce** – Director

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Date

A handwritten signature in black ink, appearing to read "Lesley Harrison".

01.11.2023

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Signed: **Lesley Harrison** – Director

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Date