

HONEYSUCKLE HEALTH PRIVACY POLICY

This Privacy Policy was last updated June 2023.

1. Introduction

Honeysuckle Health Pty Ltd respects the privacy rights of our customers and other organisations with whom we interact. We are committed to complying with all applicable privacy laws including the Privacy Act 1988 (Cth), Australian Privacy Principles and applicable State legislation.

Within this Privacy Policy, “we”, “our”, “us” and “Honeysuckle Health” refers to Honeysuckle Health Pty Ltd, ABN 55637339694.

This Privacy Policy tells you how Honeysuckle Health handles personal information.

2. Collection of Personal Information

I. What Personal Information Do We Collect?

Personal information means information or opinion that reasonably identifies you as an individual. The types of personal information we collect include your name, contact details and gender.

The types of personal information (including sensitive information) we collect will depend on your relationship and interaction with us. This includes whether you are:

- a Honeysuckle Health customer - name, contact details, gender;
- an authorised representative of a Honeysuckle Health customer – name and contact details;
- a registered health service provider, in relation to your agreement with us or one of our business partners who we act as an agent on behalf of. We collect name, contact details, specialities, registration, and billing details;
- job applicant – name, contact details and other information in your job application; or
- another third party (such as an existing or potential business partner) - name, contact details, and the details of the business

Sensitive information is a subset of personal information that includes your health information (including medical history), genetic information, information about your racial or ethnic origin, political opinion, religious beliefs, sexual orientation and criminal record.

Depending on your relationship with us, the types of sensitive health information that we may collect from you includes details about your medical conditions, treatment, and care. We may also collect information on your cultural background when this is relevant to your care (e.g. to ensure culturally appropriate practices, and to identify cultural-specific programs that may be available to you). Other sensitive information we may collect, where relevant, include your psychosocial situation, and sexual orientation.

II. How We Collect Your Personal Information

a. Information we collect from you

We collect your personal information during the course of providing you with health services or in association with managing provider networks on behalf of our business partners when it is relevant and reasonable to do so. This includes where we enrol you in one of our health management programs.

Wherever possible, we will seek to obtain your consent prior to collecting your personal and sensitive health information.

This collection may occur in a variety of ways, including through the forms you complete in electronic

or hard copy form, on our website or through email, when you enrol for our digital health programs on the relevant apps or where you provide us with information over the telephone.

You may nominate a representative to speak with Honeysuckle Health on your behalf and discuss your personal information and sensitive health information with us. Provided that you and your nominated representative both provide consent, we may collect, use and disclose your personal information and sensitive health information to your nominated representative.

b. Information about Authorised Representatives that we collect from Honeysuckle Health Customers.

We may collect the personal information of nominated representatives. We collect this information in order for us to be able to verify the identity of the nominated representative and communicate with them about a patient's care.

c. Information we collect from third parties

We may collect personal information about you from third parties such as your doctor, treating hospital, health insurer, or other health service provider, if it is not reasonable or practicable to collect this information from you, or with your consent. This may also include other people or organisations who might be representing you, or any person assisting or representing us.

d. Publicly available resources

We may also collect your personal information from publicly available sources such as internet search engines and social networking services. When we do so, we ensure that we have a legal basis for using your personal information, such as to enable us to contact you and offer our products and services to you.

e. Information we collect from search engines and applications

Like many companies, we use technology and tools that tell us when a computer or device has visited or accessed our website content. Those tools include services from search engines and other companies that help us to tailor our products and services to better suit our customers and potential customers.

Search engines provide facilities to allow you to indicate your preferences in relation to the use of those tools in connection with computers and other devices controlled or used by you. Our mobile applications may also collect precise location information from your device if you consent to the collection of this information, and we will always respect your preferences including if you choose to withdraw your consent at any time.

We strive to collect personal information directly from you with your knowledge and consent. However, if you do not consent and we do not have your personal information, we may not be able to process your requests or employment application or provide our services to you including providing health management programs or other assistance.

3. Remaining Anonymous

You have the right to remain anonymous or use a pseudonym when interacting with us. However, it may not always be possible for us to provide a service to you if you choose to remain anonymous. For example, we may need to liaise with your health insurer or treatment team we assess your suitability for a particular healthcare program or service. We will inform you if you are unable to remain anonymous when dealing with us.

4. Purposes for Which we Collect, Hold, and Use Your Personal Information

How we use your personal information depends on our relationship and interaction with you. Below are the main purposes for which we collect and use your information:

- to identify you, and respond to and process your requests for information;
- to determine your eligibility to provide or receive a Honeysuckle Health product or service;
- to provide health management programs;
- to manage, deliver and administer services and programs that you participate in
- to offer and provide personalised health information, support and services;
- to provide you with communications and invitations and offers for products and services including new products or services that we or our third-party business partners believe may be of interest to you, and to assist in developing new products and services (see further below); and
- to provide you with advice relating to your needs

Authorised Representative

- To verify your identity as the authorised representative for the Honeysuckle Health customer; and
- In the course of collecting, using and disclosing the personal information of the patient whom you represent.

Third Parties / Business Partners

- to carry out a business or professional relationship we may have with you.

Job Applicant

- if you apply for employment with us, to consider your application and contact you.

Health Service Provider

- where you are a health service provider, to create and provide access for customers and other third parties to directory services.

We also use your personal information for the following internal purposes:

- to evaluate the effectiveness of our health management programs and the service we provide to our customers;
- to prepare internal reports for the purposes of improving our products, services and internal operations;
- to manage complaints and disputes, and report to dispute resolution bodies;
- to manage, train and develop our employees and representatives;
- to perform quality audits;
- to amend records to remove personal information; and
- for other everyday business purposes that involve the use of personal information.

We ensure that we have an appropriate legal basis to use your personal information in these ways, including:

- for our usual business functions and activities (such as managing our business operations, developing and improving the products and services we offer, company re-structure or selling part of our business);
- where we have clearly explained a proposed use and you have provided your consent; and
- where we have a legal or regulatory obligation that we must comply with or is in the substantial public interest (such as to prevent fraud or money laundering) or we need to use

your personal information to establish, exercise or defend legal rights (such as debt recovery) or whenever courts are acting in their judicial capacity.

We do not conduct direct marketing, but we do conduct follow-up communications about the service/s you received. You may opt out of these follow-up communications at any time.

5. Use and Disclosure of Personal Information

We use and disclose your personal information and sensitive health information to relevant individuals, organisations and other contracted entities as is necessary for us to provide our services to you.

For example, we may disclose your personal information to:

- a person acting on your behalf including a person authorised by you or to whom you have granted a delegated authority;
- your private health insurer (if applicable);
- your medical specialists, your general practitioner and other allied health specialists;
- service providers that we use to carry out activities on our behalf, for example, auditors, IT vendors and third party sub-contractors delivering services on our behalf
- to others who may be involved in your care, for example, hospital discharge planners;
- where relevant, a third-party purchaser of our business or assets;
- where relevant, local registration boards and professional and industry bodies and associations, or to external dispute resolution bodies; and
- in additional ways you may also agree to.

We may also use and disclose your personal information and sensitive health information to comply with Australian Law or if required by a court or tribunal order.

We may also use and disclose your personal information to the extent that we have another legitimate purpose, such as to manage our business operations or to conduct data analytics to improve our offerings. We may also share with others and disclose de-identified personal information (including aggregated, anonymous or pseudonymised information) for business and marketing purposes.

We may use or disclose your personal information in circumstances where we consider that there is an immediate threat to the health or safety of yourself, our patients, staff or the wider public.

6. Security of your Personal Information

We have systems and processes in place to securely store your personal information and sensitive health information. Some of our systems for storing your information include:

- electronic storage through computer systems
- paper records; and
- cloud storage.

We take proactive steps to protect your personal information and sensitive health information from misuse, interference, loss, unauthorised access, modification and disclosure with appropriate safeguards and security measures. The measures that we take include:

- only allowing authorised personnel access to your personal and sensitive health information;
- ensuring our personnel is trained and aware of Privacy Acts, Cyber Security Awareness and Australian and Consumer Laws;
- ensuring your data is stored and accessed in a secure and safe manner;
- when we engage a third-party service provider, we leverage infrastructure hosted in Asia-Pacific public cloud regions, and in normal operating circumstances this will mean that your data is stored in Australia. We conduct supplier assurance activities, as well as continuous security assessments, to ensure your data is managed responsibly.

When you share information with us (such as over the internet, or by sending us an email), it is at your own risk, as factors beyond our control include the security of your device and/or the program you use, to communicate with us. If you reasonably believe that there has been unauthorised use or disclosure of your personal information, please contact us (see below).

Our website may contain links or references to other websites not subject to this Privacy Policy. You should check their own privacy policies before providing your personal information.

7. Disclosure to overseas recipients

We may need to provide your personal information and sensitive health information to an overseas service provider in circumstances where technical support is required. In such circumstances, we strictly control and limit how they can access your personal information. We also have contractual measures in place to ensure that the overseas recipient will comply with the Australian Privacy Act and the Australian Privacy Principles.

8. Accessing and correcting your personal information

We use our best endeavours to ensure that the personal information we collect, use, and disclose is accurate. Please let us know if there are any errors, or if there are changes to any of your personal information, such as a change of address.

Under the Australian Privacy Act, we are required to provide you with access to the personal information we hold about you. You are also entitled to make an amendment request if you consider the information we hold about you is inaccurate or incorrect.

We may require proof of identity before processing your access or correction request. We will respond to your request as soon as we reasonably can, including notifying you if we are unable to provide access (such as when we no longer hold the information) or if we are permitted by the applicable law to refuse access.

Generally, we cannot impose a charge for giving access to your own personal information, unless permitted to do so by an Australian law, Court, or Tribunal order. We may however charge you a reasonable fee for the retrieval costs associated with providing you with access.

9. Privacy Enquiries and Complaints

If you have any questions, concerns, or complaints regarding the way that your personal information has been collected or handled by Honeysuckle Health, please contact our Privacy Officer whose contact details are provided below:

Email: privacy@honeysucklehealth.com.au

Mail: Level 1, 6 Newcomen Street, Newcastle, NSW 2300.

We will establish, in consultation with you, a reasonable process, including time frames provided by applicable laws, for seeking to resolve your complaint.

If you are not satisfied with our response, you can contact or make a complaint to the Office of the Australian Information Commissioner.

Email: enquiries@oaic.gov.au

Telephone: 1300 363 992 (from overseas +61 2 9284 9749)

10. Changes to this Privacy Policy

This Privacy Policy is current at June 2023. We may review and change this Privacy Policy from time to time.

Previous changes:

Version	Month	Change
1.7	June 2023	Update email address for Honeysuckle Health.
1.6	February 2023	Update to the list of Security measures taken to protect personal information, and the type of sensitive information we may collect. Add types of Health Service Provider information that we collect.
1.5	July 2021	Update to include digital health programs and apps as ways information is collected.
1.4	April 2021	Update to the language in the Disclosure to overseas recipients
1.3	October 2020	Wording on data storage locations to reflect potential disaster recovery / capacity issue scenarios. Added heading numbering
1.2	September 2020	Update of titles for health programs and applicability of the collection notice
1.1	August 2020	Include information handling procedures related to a nominated representative
1.0	April 2020	Initial version