



ER-CRP-GRP-POL-122

Privacy Policy

PUBLIC

Owner and Approver

Document Owner(s)	Reviewers	Approver
PCO	Governance Council	EGM

Version Control

Version	Date	Approver	Change description
1.0	01.06.2017	CSO	Version 1
2.0	30.12.2020	BPM	Version 2
2.1	09.08.2021	BPM	Annual Review – Effective Date changed
2.2	19.01.2023	EGM	Update template. Added privacy-security email address as means of contact.
2.3	20.03.2023	N/A	Minor changes to formatting, added updated logo.

eReports at its discretion, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time without prior notice. In the event of a policy change, employees will be notified. Any such action shall apply to existing as well as to future employees.

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eReports PRIVACY POLICY

eReports complies with the State and Commonwealth Privacy Laws including the Privacy Act 1988 (Cth), the Australian Privacy Principles and state privacy laws including the Health Records Act 2001 (Vic) (collectively, Privacy Laws). eReports is committed to your privacy and to continue providing services in a confidential and safe manner.

This Privacy Policy summarises how eReports handles an individual's personal information.

As a client of eReports, you can be assured that all personal and sensitive information you provide to eReports will be respected and kept secure in accordance with Privacy Laws and this Privacy Policy. By engaging with eReports you acknowledge your acceptance of this Privacy Policy.

Information eReports collects and holds

Definition of Personal Information

Personal information is defined by the Privacy Act 1988 (Cth) as "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."

From time to time, eReports may collect certain personal information only in connection with the purpose for which it was collected as being reasonably necessary for or related to eReports' business. The kind of information we collect will depend on your relationship with eReports (for example as a client, business partner, employee or contractor). Generally, the only personal information eReports collect about you is that which you choose to tell us or which you authorise eReports to obtain.

The type of information eReports collect may include:

- Examinees*: your name, gender, address, email addresses, telephone number, demographic data (non-sensitive information only) and health and/or disability information (including history), medical claims history.
- Clients (referring party and examinees engaging services in their own right): your name, address, email address, telephone number, billing information (if purchasing products) and tax file number, tax residency status, trading history.
- Consultants: your name, gender, address, telephone numbers, email addresses, tax file number, ABN, tax residency status, employment history, police history (if any) and billing information, professional associations, qualifications, accreditations, professional registration information, professional indemnity insurance details, provider number, health and/or disability information (including history), emergency contact details.
- Other (including employees/potential employees): your name, address, email address, telephone number, tax file number, tax residency status, current assets, current loans

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and other encumbrances, employment history, police history (if any) and billing information.

NOTE: Examinees includes persons referred by a client who engages eReports to facilitate assessments delivered by third-party suppliers.

Sensitive Information and examinees

Sensitive information is a special category of the most sensitive personal information including racial or ethnic origin, political opinion, police record, health and disability information etc.

The only sensitive information eReports collects is the health or disability information (including history) or sexual practices (where relevant only) of examinees.

How eReports collect and hold your personal information

Where possible, eReports will collect your personal information directly from you but information may also be collected via:

- Health records provided to us (including as part of psychological or medical assessments (examinees only)
- Inquiries that we might make of your employer or treating practitioners (examinees only),
- Credit checks (clients only)
- National Police History Checks and other pre-employment checks (employees and examinees only)
- credit reporting bodies (clients only)
- other credit providers (clients only)
- organisations that eReports has an arrangement with to jointly offer products and/or an alliance with to share generic/non-identifiable information only for marketing purposes to provide you with products or services and/or to promote a product or service (clients only)
- marketing companies, if eReports acquires contact information to tell people about eReports products and services that may interest them (clients only)
- brokers and other parties who may have introduced you to eReports (clients only)
- through audio recordings taken with your consent during your assessment (examinees only)

Personal and sensitive information may be collected from you when you provide it to eReports directly.

eReports has established appropriate physical, electronic and managerial procedures to safeguard any information eReports collect. This helps prevent unauthorised access, maintains data accuracy and ensures that the information is used correctly.

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All data transferred to and from the eReports servers is encrypted and a firewall is in place to prevent intrusion. All data stored within the eReports' systems is designed to only be able to be accessed by authorised staff members and the hosting facility.

The purpose for which eReports collects, holds, uses and discloses personal information.

eReports collects personal information that eReports considers relevant, and which is outlined in your written consent, for the purpose of providing eReports' services. Sensitive information, in most cases, can only be disclosed with your written consent. Any personal information collected about an individual will not be used or disclosed for the purposes of direct marketing unless the individual has given eReports consent to do so. Any personal information will not be disclosed to any overseas recipients, unless the individual has given eReports consent to do so.

Some of the ways eReports uses personal information include to:

- communicate with you and others as part of eReports' business.
- enable eReports to provide a service.
- personalise the eReports experience.
- send you information regarding changes to eReports' policies, other terms and conditions, online services and other administrative issues
- manage accounts and perform other administrative and operational tasks (including risk management, systems development and testing, credit scoring and staff training, collecting debts and market or client satisfaction research)
- prevent, detect and investigate crime, including fraud and money laundering, and analyse and manage other commercial risks.
- verify information given to eReports.
- carry out market research and analysis, including satisfaction surveys.
- provide marketing information to you (including information about other products and services offered by selected third party partners) in preferences you have expressed.
- manage eReports' infrastructure and business operations and comply with internal policies and procedures, including those relating to auditing, accounting, billing and collections, IT systems data and website hosting, business continuity and records, document and print management.
- resolve complaints, and handle requests for data access or correction.
- comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering, sanctions and anti-terrorism.
- comply with legal process and respond to requests from public and governmental authorities (outside your country of residence)
- establish and defend legal rights protect eReports' operations or those of any of eReports' group companies or insurance business partners, eReports' rights or property and/or that of eReports' group companies, you or others and pursue available remedies or limit eReports' damages.

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Others (for example, potential or current employees):

- all of the above
- assess your current or past financial/credit position.
- assess your suitability and continued suitability for employment.

To whom does eReports disclose your personal information?

eReports may disclose your personal information to:

- government authorities (where required by law including workers compensation laws)
- third parties involved in court action (where required by law)
- other parties that provide support services to eReports' including support merchant services, online sales and marketing programs
- professional advisers
- potential business partners or purchasers
- credit agencies (clients only)

For examinees only, depending on the nature of the services we provide for you, to collect from and disclose your personal/sensitive information to the following third parties:

- your nominated treating doctor.
- who, by agreement is deemed necessary
- your employers return to work co-ordinator.
- referring agency
- medical consultants, any other treating practitioner or other health providers that eReports may deal with on your behalf.

What happens if you don't provide personal/sensitive information?

If you do not provide some or all of the information requested, eReports may not be able to provide eReports' services.

Using a pseudonym or engaging with eReports anonymously

Due to the nature of eReports' services, it is impractical to engage on an anonymous basis or using a pseudonym. As such, the use of pseudonyms and the facilitation of anonymity will not be possible.

Audio recordings

eReports medical consultants may choose to record your assessment as a reference for their use in preparation of a medical report. These recordings are made with your consent.

All audio recordings are stored on eReports secure file servers with appropriate security measures employed.

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Credit Card Details

eReports does not store credit card numbers in eReports' system except with respect to Consultants. Your credit card details will be passed to the payment gateway as soon as they have been collected. Consultant's credit card details are stored by eReports' using all appropriate security measures.

Website cookies and usage information

When you access eReports' website, eReports may use software embedded in eReports' website (such as JavaScript) and eReports may place small data files (or cookies) on your computer or other device to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how eReports perform in providing content to you. A cookie does not contain any personally identifiable information, but it does identify computers.

You can set your browser to notify you when you receive a cookie, and this will provide you with an opportunity to either accept or reject it in each instance. eReports may gather your IP address as part of eReports' business activities and to assist with any operational difficulties or support issues with eReports' services. This information does not identify you personally.

External Links

eReports' website may contain links to other websites. When you access these links eReports recommend that you read the website owner's privacy statement before disclosing your personal information. eReports does not accept responsibility for inappropriate use, collection, storage or disclosure of your personal information collected outside eReports' website.

Opting out of direct marketing communications

Where eReports use your personal information to send you marketing and promotional information by post, email or telephone, eReports will provide you with an opportunity to opt-out of receiving such information. By electing not to opt-out, eReports will assume eReports has your implied consent to receive similar information and communications in the future. eReports will always ensure that eReports' opt-out notices are clear, conspicuous and easy to take up. If you wish to opt out of communications from eReports, please use the contact details below.

eReports will not market directly to examinees unless they are also clients.

Cross-border disclosures of your personal information

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eReports does not currently use offshore service providers with regard to storage of personally identifiable information. However, eReports reserves the right to use data hosting facilities and third-party service providers both in Australia and overseas to assist eReports with providing our goods and services.

How an individual can access their personal information held by eReports

If an individual wishes to exercise their rights to access their personal information held by eReports, or alternatively, has any questions or believes that any personal information held by eReports is incorrect or incomplete, the individual can write to eReports' Privacy Officer at the address below.

Except in the case of compliance with the law (including requested by subpoena), personal information will only be released to the individual directly, unless eReports has written consent by the individual concerned to provide such information to a third party.

Updating and correcting your personal information

You may ask eReports to update, correct or delete the personal information eReports hold about you at any time by contacting the Privacy Officer as specified below. eReports will take reasonable steps to verify your identity before granting access or making any corrections to or deletion of your information.

eReports will, upon request, take all reasonable steps within its powers to correct the information in its possession or, if necessary, discuss alternative actions with the individual. In cases where the information was provided by a third party, eReports may not be able to correct information and you may have to contact the third-party that gave information to us.

eReports also has obligations to take reasonable steps to correct personal information eReports holds when eReports is satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading for the purpose for which it is held.

How to contact eReports regarding privacy

If an individual would like to make further inquiries about a breach of the Australian Privacy Principles, or a registered Australian Privacy Principles code (if any) that may relate to eReports' business, contact eReports' Privacy Officer at:

By Mail

The Privacy Officer eReports
Level 8, 459 Little Collins Street,
Melbourne, Vic 3000

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By Email

Privacy-Security@ereports.com.au

eReports will take all complaints regarding privacy of information seriously. eReports will respond to any requests, questions, or complaints as soon as possible in a reasonable time frame.

Review

This policy is due for review three (3) year from its date of implementation or in the event of relevant legislative or regulatory changes.