



Statement

The Platinum Group Australia Pty Ltd, incorporating Carers & Companions, is committed to protecting all personal information in accordance with the Privacy Act 1988 (The Act) and the Australian Privacy Principles (APPs) as outlined in the Act.

The Platinum Group Australia Pty Ltd and its trading businesses are committed to protecting the privacy and personal information of our clients. Our clients generally include applicants for positions, business to individual consumer and at times, business to business consumers, and occasionally business to government agencies, for service transactions.

Definitions

In this Privacy Policy, “we” and “us” refers to Platinum Group Australia Pty Ltd and “you or your” refers to users, relatives of users, employees, service providers, prospective contractors, contractors, job applicants and any other individuals who we come into contact with.

Personal information means information about an identified individual, from which their identity is apparent or can reasonably be determined. This information can include names, dates of birth, email addresses, home and work addresses, telephone numbers, photographs and health information.

Sensitive information means information or an opinion about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information and genetic information other than health information.

Privacy Collection Statement and Consent to Electronic Transactions

The personal information we may collect about you will differ depending on whether you are a potential client, a candidate or business. Information may range from the sensitive (e.g. relevant medical history or criminal history) to the everyday (e.g. address and phone number). For potential employees, we may collect the opinions of others about your work performance, your work experience and qualifications, aptitude test results and other information in connection with your possible work placements.

Carers and Companions will only collect information that is necessary to deliver our services, tasks or functions that support this.

We do not collect or use personal information for the purposes of unlawful discrimination. We do not collect personal information just because we think it could be useful at some future stage if we have no present need for it.

Potential employees, may need to undergo a routine criminal history checks and we may request this only in order to obtain relevant criminal history and with regard to particular placements in which you may be offered.

What information does *Carers & Companions* collect and why?

The types of information we generally collect includes your name, date of birth, address and other contact details such as your telephone numbers and email address. Depending on the purpose of our interaction with you, we may also collect additional personal information.

We will collect information essential to providing our services, and information required by State and/or Federal Government Departments.

The information collected may differ for various candidates, individual clients and businesses.

Applicants/Candidates

Information collected for candidates may include (but not limited to) the following:

- Name and contact details;
- 100 point Identification;
- Date of birth and residency including visa verification;
- Qualifications, work history, resume and application information;
- Bank account details and Tax File Number;
- Superannuation details;
- Driver's license number, First Aid Certificate, current National Police Check (currency within 2 year timeframe) and Working With Children Check clearances;

Generally we collect this information directly from you or at times may seek information from third parties such as other recruitment agencies and previous employers.

An Employee records contains personal information relating to the employment of a staff member. Example of information collected may include:

- The terms and conditions of employment of the staff member;
- Disciplining or resignation of the staff member;
- Training completed;
- Staff emergency details;
- The staff member's performance and conduct

Prospective clients and current clients

Carers & Companions authorised employees may collect a variety of personal information when you enquire about our services or when you become a client of Carers & Companions. Providing us with accurate and complete information is important for the safety, quality and effectiveness of the services we provide.

Examples of health information which Carers and Companions may regularly collect include:

- The health or a disability at any time of an individual;
- An individual's expressed wishes about the future provision of health services received by him or her;
- Care plan;
- Medications;

- Your previous and current medical history and details of treatment and health services received;
- Information about other healthcare professionals and health service providers involved in your care;
- Information about your healthcare preferences, Advance Care Directive; and
- Attorney, guardianship or other person responsible for healthcare decisions.

Carers and Companions will also collect relevant financial information in order to enable fees and charges to be accessed for payment arrangements, such as your banking details.

Carers and Companions will collect personal information where practicable from you directly, as way of example, when we have contact with you in person, over the phone or via the internet. We may also collect personal information about you from third parties including:

- Your Power of Attorney, General Practitioner, Aged Care Assessment Service or Hospital and other healthcare professionals and health service providers involved in your care;
- We also may collect information about you from your family members, a carer, enduring guardian, or a person responsible for your healthcare decisions.

Carers and Companions may collect information through a variety of ways including:

- Via our website;
- Electronic or face to face interactions;
- Via telephone enquires;
- From third party referral services;
- Requests for information;
- Through provision of our services.

The information we request is relevant in providing you with the care services you need. Some individuals may not want to disclose and provide information to Carers and Companions and as a result, Carers & Companions may not be able to provide you with the care you require.

Who will be collecting your personal and sensitive information?

Your personal information will be collected by Carers & Companions for its own use and on behalf of third parties who might require access to your personal and sensitive information in connection with your work placements or services that you receive from us.

Your personal information will be held by Carers & Companion until it is no longer needed. Some of your personal information may be held on portable devices such as mobile phones, laptops, and computers. If you are a client, your personal information will be held of 7 years from the date of last entry in your record (or in the case of children, until they are 25).

The purpose for which we collect, hold, use and disclose personal information. All means of collection of personal information will be by lawful and fair means and will be used and disclosed for the primary purpose for which it was collected.

Typically this will include:

- communicating with our clients and suppliers
- managing and providing the organisation's services to our clients

- complying with our legislative and regulatory responsibilities
- conducting pre-employment checks
- marketing our services

Other individuals

Carers and Companions may be required to collect personal information from individuals such as service providers that manage packages on behalf of our clients, other individuals who interact with Carers and Companions on a commercial basis ; Allied Health Services sector and professionals whom have referred clients to us or who are providing services to our clients on behalf of Carers and companions.

Disclosure to third party service providers

We may disclose client Personal Information to third party contractors and service providers that help us to operate our business and to deliver services to clients, such as, without limitation, IT service providers, Allied Health providers, payment system operators, financial institutions, debt collectors, couriers, mailing houses, accountants, solicitors, business advisors and referral services. When Carers and Companions provides Personal Information to companies who perform services on our behalf, we require those companies to protect Personal Information as diligently as we do.

This includes a range of administrative, management and operational purposes such as administering debt recovery, reporting to Government agencies for funding purposes, safety and quality, training staff, risk management and claim administrators (such as liaising with legal representatives and insurers).

Use and Disclosure

Generally, all means of collection of personal information will be by lawful and fair means and will be used and disclosed for the primary purpose for which it was collected unless we have authorisation from the individual to disclose for a different reason.

Communication and Marketing

We may use your personal information to communicate with individuals through emails, newsletters or direct marketing, in accordance with Privacy legislation and Privacy Act, unless you have requested previously requested that we do not do so. All communication will provide the option to opt out or unsubscribe or alternatively you can email your opt out to info@carersandcompanions.com.au.

Disclosure required or permitted by law

In some circumstances we may be authorised or required by law to disclose certain personal information relating to Government agencies such as the Australian Taxation Office, Centrelink, Child Support Agency, or disclosure to courts under subpoena and the like.

Disclosure is permitted under the Health Privacy Principle 2, where Carers and Companions reasonably believes that disclosure is necessary to prevent or lessen a serious and imminent threat to an individual's life, health or safety or a serious threat to public health or public safety; or if we have reason to suspect unlawful activity. We then may use or disclose the Personal Information as part of our investigation of the matter or in reporting our concerns to the relevant authorities to allow an enforcement body to enforce laws or conduct legal proceedings.

Anonymity & Pseudonymity

You may wish to enquire about C&C's services anonymously or by use of a pseudonym. We may suggest services that may be suitable however; we cannot provide actual services to those that haven't disclosed their true identity.

Visitors to our website

When the Carers and Companions website is visited, anonymous technical information may be collected about each user's activities on our website.

This information is used by Carers and Companions to help us make decisions in improving our site and suite of services we offer clients.

Carers and Companions website uses Cookies. A cookie is a small file placed on a computer via a web server and does not identify a specific individual user, just the computer used, which assists with managing customised settings of the website and delivering the content. This helps us identify which webpages are more popular, peak usage times and other information that helps make our website more efficient to use.

Web users can choose if and how a cookie will be accepted by setting their preferences and options in their browser. Carers and Companions uses third-party services such as Google Analytics to undertake demographical analysis of visitors to our website.

Dealing with unsolicited personal information

If we receive personal information and did not solicit the information we will within a reasonable period determine whether or not we could have collected the information if we had solicited the information and destroy it if not required.

We will destroy the information or ensure the information is de-identified if we believe that we could not have collected the personal information.

Accessing your information

You have a right to access your personal information, subject to some exceptions allowed by law, and to request a change to your information if you consider it is incorrect. If we are unable to agree that personal information that we hold about you is not misleading, relevant accurate, complete and up-to-date, you may ask us to replace with the information provided by a statement by you, that claims that particular information is misleading, irrelevant, not accurate, incomplete or out-of-date.

You may contact us if you would like to access your personal information or care records. In some circumstances, where the information is in the past and has been archived, Carers & Companions may charge a fee for searching for and providing access to your information.

You may write to us or call 1300 290 221

Privacy Concerns / Data Breaches

When we collect Personal Information from an individual, we take all reasonable steps to ensure its security. In the event of an eligible data breach where your data has been impacted, under the Notifiable Data Breaches Scheme (Part IIIC of the Privacy Act 1988), Carers and Companions have an obligation to notify affected individuals and potentially, the Office of the Australian Information Commissioner (OAIC) about an 'eligible data breach' which is likely to cause serious harm to any of the individuals to whom the information relates.

An 'eligible data breach' occurs if all three of the below criteria are met:

1. There is unauthorised access to, or unauthorised disclosure of, personal information, or loss of personal information that Carers and Companions holds.
2. This is likely to result in 'serious harm' to one or more individuals ('serious harm' may include serious physical, psychological, emotional, financial or reputational harm);
3. Carers & Companions has not been able to prevent the likely risk of serious harm with remedial action; or we have been unable to remedy a situation in line with the Act.

Examples of a data breach could include, but are not limited to; loss of a computer or data storage device containing personal information; unauthorised access to personal information as a result of a hacking attack or data breach; employees or contractors accessing or disclosing personal information outside the bounds of their employment; emailing, sending or simply providing personal information to the incorrect people.

We take any suspected breach of privacy very seriously. If you believe your personal information has been used in a manner inconsistent with the Carers and Companions privacy policy you may raise this as a complaint with us.

- Talk to the person in charge or any health worker at the time of the problem.
- You can write, phone or see the person in charge at any time during your care or afterwards.
- If you are not satisfied with the results of your complaint you can contact the Director of Carers and Companions.

Online Collection and use

When you visit the Carers and Companions website, the Internet Service Provider makes a record of your visit and logs the following information for statistical purposes:

- Your server address;
- Your top level domain name (for example .com, .gov, .au, .uk etc);
- The pages you accessed and documents downloaded;
- The previous site you have visited; and
- The type of browser you are using.

Carers and Companions will not make an attempt to identify users or their browsing activities; we will only record your e-mail address if you send us a message. Your e-mail address will only be used or disclosed for the purpose for which you have provided it and it will not be added to a mailing list or used or disclosed for any other purpose without your consent.

Google Analytics Demographics and Interest Reporting have been enabled and as a result personal information about users such as age, gender and interests may be collected. Such information will only be used or disclosed for the purpose of Carers and Companions gathering a knowledge base in trying to fine-tune our services to help meet the needs of our clients.

Making a Complaint about the handling of your personal information?

If you wish to make a complaint about any breach or potential breach of this privacy policy, you should contact us and request that your complaint be directed to the Operations Manager as set out below.

The Operations Manager will review your complaint to determine immediate steps to be taken to resolve the complaint. C&C agreed response time to reply to your complaint is generally within a week in receipt of receiving it; some complaints may take longer depending on the complexity.

If your complaint requires investigation, we will acknowledge receipt of your complaint within a week. We may need to request further information from you and the outcome you are seeking and review the information at hand and may need to speak with individuals involved. In most cases, we will respond to a complaint within 30 days however if the complaint is of a more complex matter, we may take longer but will advise you along the way.

If you are not satisfied with our response, you are entitled to contact the Office of the Australian Information Commissioner by calling 1300 363 992. Further details for the Office of the Australian Information Commissioner can be found online, by visiting: www.oaic.gov.au

How can you contact Carers& Companions?

The contact details for us are:

Address: Level 10 15/809 Pacific Highway, CHATSWOOD NSW 2067

Email: info@carersandcompanions.com.au

Phone: 1300 290 221

This policy was last updated in May 2020.