

# Privacy Policy

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## ELEMENTS HEALTHCARE PRIVACY POLICY

Elements Healthcare Pty Ltd (Elements) recognises the importance of protecting the privacy of our customers and other third parties who provide their personal information to us.

Our Privacy Policy was last updated on 1<sup>st</sup> April 2015 and includes disclosure of the matters set out in the Australian Privacy Principles.

### Information Collected

When used in this policy, “personal information” has the meaning given to that term in the *Privacy Act 1988* (Commonwealth). Personal information generally includes any information that can be used to personally identify you.

We may collect (amongst other things) the following types of personal information from you:

- name;
- residential or business address;
- email address;
- post code;
- gender;
- age and date of birth;
- signature;
- telephone number;
- Medicare number;
- pension/concession/DVA numbers;
- proof of identity, such as your driver’s licence or passport number;
- a photograph, if you reside in a Residential Aged Care Facility (RACF);
- if you are a candidate for employment, we may collect other information as further set out in our application forms or during the recruitment process. This may include information relating to your employment history, working eligibility rights, suitability for the role you are applying for, and your referee details.

We may also collect information from you that is not personal information because it does not identify you personally. This information is retained with your personal information and may include:

- a list of products ordered for you by a doctor, nurse, nurse practitioner, RACF or any other authorised person. This may include your purchase history, product types, departments, specifications, sizes, dimensions, colours, occasion date, or other attributes of products and services we have provided to you;
- information we require to deliver, service or fulfil warranty obligations for products or services;
- your marketing and communication preferences, including the type of marketing materials you wish to receive and the method of delivery (email, SMS, direct mail, or other);
- information you provide to us via our customer service centre, website, application forms, or directly to team members in relation to our products and services; and
- device identification information when you use a computer, mobile phone, smart phone, tablet, or other device to interact with us through our online store. This information may include session cookies, your device IMEI number, IP address or MAC address.

We may use temporary (session) cookies or permanent cookies when you access our web site. This allows us to recognise your browser and track the web pages you have visited. You can switch off cookies by adjusting the settings on your web browser.

If you send us personal information that we have not requested, or we determine that the personal information you have provided to us is not reasonably necessary or directly related to any of our functions or activities, we may de-identify or delete this information without notifying you to protect your privacy.

### **How we collect your personal information**

Normally we collect information from, you directly, family members, pharmacies that originally supplied medication to you, from residential aged care facilities and health care professionals when entering health information into our medication management system, or changing that information; and from other health care professionals in the course of providing services to individuals.

Collection of your personal information can occur through the following interactions:

- when you access and use our website;
- during conversations with our team members;
- when you complete purchase orders, registrations, requests or applications for our products or services (by phone, in person or electronically);
- when you communicate with us directly (by email, telephone, direct mail or any other means);
- when you interact with us during promotions, competitions, special events; or
- if you are a candidate for employment, when you complete forms in relation to the recruitment and selection process, for the purpose of assessment.

We may also collect personal information about you from third parties:

- if you are a candidate for employment, we may collect information about you from your nominated referees, where you have authorised us to do so.

### **How we hold your personal information**

We may hold your personal information in either electronic or hard copy form.

If you provide information to us electronically we retain this information in our computer systems and databases. This includes computer software programs, internet servers, and hosted internet solutions provided by third parties.

If you provide information to us in hard copy (paper) this information is normally retained in our files and a copy is made to our electronic files.

### **Data Integrity and Security**

We use industry standard security measures to safeguard and protect your information. This includes taking reasonable steps to ensure your personal information is protected from misuse, loss, unauthorised access, modification or disclosure.

Elements endeavours to ensure that all personal information it holds is accurate, complete and up-to-date. To assist us with this, individuals should contact us if any of their personal information changes, or if they believe that the personal information we have is not accurate or complete.

Elements takes reasonable steps to protect the personal information that it holds from misuse, interference or loss, or from unauthorised access, modification or disclosure.

If Elements no longer requires personal information that it holds (including when we are no longer required by law to keep records relating to you), it will take such steps as are reasonable in the circumstances to destroy the information or ensure that the information is de-identified.

### **If we are unable to collect your personal information**

If we are unable to collect your personal information, some or all of the following may occur:

- we may be unable to provide products or services to you;
- we may be unable to communicate with you to provide information about products and services that you have purchased from us;
- we may be unable to tailor the content of our marketing communications to suit your preferences;
- your experience when interacting with us may be delayed or not as efficient as you may expect; or
- if you are a candidate for employment, we may not be able to process your application for a position at Elements.

### **Purpose of collection of your personal information**

We collect your personal information so that we can carry out the following actions (“**Purpose**”):

- to provide you with products and services that you or others have requested from us;
- to provide you with products and services that you or others have requested from us at a concessional rate.
- to communicate with you, including about products and services, competition results, special offers, and events which might interest you;
- to answer your questions and provide you with information or advice;
- to create orders, transaction records, agreements for the sale of products or services, accounts, tax invoices or receipts;
- provide your personal information to third parties that assist us in providing products and services requested, such as doctors;
- carry out administration, marketing, planning, fraud and loss prevention activities, procurement, product and service development, quality control and research to improve the way Elements and service providers provide products and services to you;
- to consider and respond to complaints made by you;
- to comply with laws or regulations or to comply with any directions given by regulators or authorities;  
or
- if you are a candidate for employment, to assess your suitability for a position at Elements.

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

Your personal information may be disclosed in connection with any Purpose to any of the following:

- our employees, contractors or service providers, to the extent reasonably necessary to fulfil our obligations to you. This may include internet service providers, IT systems administrators, mailing houses, couriers, payment processors, and data entry service providers;
- our business advisors, including lawyers, accountants or other professional service providers, to the extent reasonably required;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing and related purposes;
- if you are a candidate for an employment position involving a third party with whom we have an agreement, to that third party to assess your application; and
- if required by law, to any person authorised by such law. This may include the police service, ambulance service, or government departments or regulators within Australia in connection with law enforcement activities.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

Elements does not use any government related identifiers, such as Medicare numbers, as its own internal identifier of any individual. Elements will not use or disclose any government related identifiers other than in accordance with the Privacy Act.

### **Direct Marketing**

We may send you direct marketing communications and information about products and services offered by us or our retail brands, partners or suppliers via email, SMS, or regular mail.

If you have indicated a preference for a method of communication, we will endeavour to use that method wherever practical to do so.

You may opt out of receiving marketing communications at any time by responding via the channel in which you received the marketing communication, or by contacting us (see contact information below). You can unsubscribe from emails by clicking the unsubscribe link on the footer of the email communication you have received. You may also update your personal information by editing your online profile.

You may also receive marketing communications by post from our retail brands, partners and suppliers who provide goods and services within our stores, but this will only occur where you have requested that type of information from us or from a third party within our stores.

We do not provide your personal information to any other organisations for the purposes of direct marketing.

### **How you may access your information**

You may access your personal information held by Elements by making a request to us.

Email: [privacy@elementshhealthcare.com.au](mailto:privacy@elementshhealthcare.com.au)  
Phone: (08) 93499611  
Mail: The Privacy Officer  
Elements Healthcare Pty Ltd  
P.O. Box 382  
Tuart Hill WA 6939

Access to personal information on behalf of others is only accessible when an Enduring Power of Attorney or Guardianship have been forwarded to Elements Healthcare, and the confirmation of such authority has been accepted.

If your request is unlawful or may interfere with the privacy of others we may reasonably refuse to provide access to your personal information.

### **Correction of your personal information**

If you would like us to update or amend your personal information, please contact us and we will make the requested amendments. We may ask you to verify your identity to ensure that personal information we hold is not improperly accessed.

### **Complaints**

If you feel your privacy has been breached, please contact us using the contact information above setting out the circumstances and reasons for your complaint. Our team members will acknowledge receipt of your complaint within 24 hours, and will normally respond to your request within 5 business days. If your complaint is complicated or requires further investigation our response may take additional time to finalise. We will respond to you by your preferred contact method if you have indicated one.

### **Overseas disclosure of personal information**

We may disclose your personal information to third parties and service providers located overseas in connection with a Purpose.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

### **Other services**

We may offer seasonal or temporary services, promotions, products, competitions or displays such as other promotional events from time to time (**Other Services**). Our Privacy Policy will apply to those Other Services but we may have additional terms which apply. Any additional terms will be made available to you when you are utilising our Other Services.

The terms of our Privacy Policy do not apply to any third party websites, which may be linked to our website.

### **Contacting us**

If you would like to contact us in relation to this Privacy Policy or your personal information please contact us at:

Email: [privacy@elementshealthcare.com.au](mailto:privacy@elementshealthcare.com.au)  
Phone: (08) 93499611  
Mail: The Privacy Officer  
Elements Healthcare Pty Ltd  
P.O. Box 382  
Tuart Hill WA 6939

We may update our Privacy Policy from time to time. Amendments will be published on our web site [www.elementshealthcare.com.au](http://www.elementshealthcare.com.au).

### **Candidates and employees**

This Privacy Policy does not apply to current and former employees of Elements. If you are a current or former employee and have a query about your personal information, please contact your Human Resources Representative.

### **Changes to this policy**

This Privacy Policy sets out how Elements manages personal information. It may be varied from time to time. It does not create any legally enforceable rights or obligations beyond the rights and obligations created by the Privacy Act.