

Person Centred Software (Aust) Pty Limited

Privacy Policy

Person Centred Software (Aust) Pty Limited ACN 620 435 752 (PCS, we, us, our) is committed to protecting your data and respecting your privacy.

Introduction

Welcome to our Privacy Policy.

The principal privacy legislation applicable to Australia is the *Privacy Act 1988* (Cth) (the Act). PCS is committed to compliance with the Act and the Australian Privacy Principles (APPs), which are part of the Act.

PCS respects your privacy and is committed to protecting your personal information. This Privacy Policy will inform you as to how we look after your personal information (i) when you visit our website at <https://personcentredsoftware.com/au/>; or (ii) when sending us an email or otherwise when communicating with us; (iii) when you interact with us such as when you (whether for yourself or on behalf of the organisation you work for) purchase products and services from us or supply products and services to us; (iv) when you visit our premises, and will tell you about your privacy rights and how the law protects you.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

We keep our Privacy Policy under regular review. This version was last updated in July 2022.

1. IMPORTANT INFORMATION AND WHO WE ARE
 2. APPLICANTS
 3. THE INFORMATION WE COLLECT ABOUT YOU
 4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?
 5. HOW WE USE YOUR PERSONAL INFORMATION
 6. DISCLOSURES OF YOUR PERSONAL INFORMATION
 7. INTERNATIONAL TRANSFERS
 8. DATA SECURITY
 9. DATA RETENTION
 10. HOW CAN YOU ACCESS AND CORRECT YOUR PERSONAL INFORMATION?
 11. HOW CAN YOU COMPLAIN ABOUT A BREACH OF PRIVACY
- GLOSSARY

IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how PCS collects and processes your personal information:

- through your use of this website, including any personal information you may provide through this website;
- when we otherwise communicate or meet with you, including communication by email or other media; and
- when you attend our premises.

This website is not intended for children and we do not knowingly collect information relating to children.

It is important that you read this Privacy Policy together with any other privacy policies or privacy collection statements we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your personal information. This Privacy Policy supplements other statements and privacy policies and is not intended to override them.

This Privacy Policy is not applicable to personal information we hold and manage as part of someone's employment record. We will hold and manage such personal information in accordance with separate privacy notices.

When we refer to 'your organisation' in this Privacy Policy, we are referring to your employer or organisation you work for.

Mobile Care Monitoring

Mobile Care Monitoring is our digital care management system for aged care service providers. The application facilitates the storage and processing of a variety of information, including personal information regarding care residents of our customers (**Customer Data**).

Mobile Care Monitoring is provided to customers via a Software-as-a-Service model, in other words, we host the application and all Customer Data is stored on our servers or those of third party service providers who we have engaged. The customer then accesses Mobile Care Monitoring over the internet. Nevertheless, we do not access, use, process, modify or disclose Customer Data, except to the extent required by permitted employees who may access the customer's account to provide the services we are contractually obliged to provide to the customer or as otherwise required by law. These services may include data migration, system configuration, maintenance and account administration. Our access to, use and disclosure of Customer Data will be governed by the terms of our agreement with each customer, which will be compliant with the Act and the APPs.

Except for the limited circumstances outlined in this Privacy Policy, access to Customer Data stored in our application is controlled directly by the customer. The customer must not input, upload, provide or otherwise make available to or through the services any Customer Data unless the customer has a legal right to do so. It is the customer's responsibility to pass on the information contained in this Privacy Policy and obtain all necessary consents from individuals:

- before their personal information is collected, stored, used, processed, modified or disclosed by the customer using any of our applications; and
- to the extent that personal information may be collected, stored, used, processed, modified or disclosed by us in accordance with this Privacy Policy.

Third-party links

This website and other communications may include links or references to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Personal information is defined by the Act as ‘information or an opinion, whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion’.

Personal information is, in simpler terms, any information about an individual from which that person can be identified. Personal information covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

Identity Data includes name, username or similar identifier and title Recordings of meetings on internet meeting platforms with prior consent

Contact Data includes address, email address and telephone numbers.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website or our services.

Profile Data includes your username and password, purchases or orders made by you or us, your preferences, feedback and survey responses.

Usage Data includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you are an individual customer or supplier (where you act in your personal capacity and not on behalf your employer or other organisation), we may also collect, use, store and transfer the following additional kinds of personal information about you:

Financial Data includes bank account and payment card details.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from or supplied to us.

We collect certain personal information about job applicants and contractors wishing to supply products and/or services to us (**Applicant Data**) as well as their employees, including name, pronouns, date of birth, contact details, details of next of kin or emergency contact, payment details, resumes, employment histories and qualifications, training records and competency assessments, police checks and other suitability checks.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal information but is not considered personal information in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

Sensitive information is a subset of personal information, which includes information about an individual’s racial origin, ethnic origin, political opinions, membership of a political association, religious belief or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, sexual practices or criminal record. We do not collect any **sensitive information** about you **except as regards job applicants and contractors, in which case** we may collect sensitive information such as medical histories directly related to the individual’s ability to perform the inherent requirements of the position, and immunisation status where required by law or with your consent

CUSTOMER DATA:

Our customers input a variety of Customer Data into the Mobile Care Monitoring application, which may include the following types of care resident information:

- name, pronouns, date of birth, contact details, details of next of kin or emergency contact, payment details, Medicare number and other information relevant to the care resident's relationship with the customer, such as communication preferences, interests and interaction history.

Our customers may also input sensitive information regarding patients, such as medical histories, racial or ethnic origin and sexual orientation.

We host the Mobile Care Monitoring application and all Customer Data is stored on our servers or those of third party service providers who we have engaged. Nevertheless, we do not access, use, process, modify or disclose Customer Data, except to the extent required by permitted employees who may access the customer's account to provide the services Zedmed is contractually obliged to provide to the customer or as otherwise required by law. These services may include data migration, system configuration, maintenance and account administration. We only access Customer Data in certain limited circumstances as detailed in this Privacy Policy.

In some limited cases, we may also collect Customer Data from the application automatically, for example, where it is contained in screenshots attached to error reports. We do not hold onto such personal information for longer than reasonably necessary and use that personal information in order to provide the services we are contracted to provide to the relevant customer.

If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you or your organisation, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you or your organisation (for example, to provide you or your organisation with products or services). In this case, we may have to cancel a product or service you or your organisation have with us but we will notify you or your organisation if this is the case at the time.

We also reserve the right to verify your identity as part of our response to a request to access and/or correct personal information we hold about you, or as part of our complaints-handling process. If we are unable to verify your identity, or you continue to engage with us in an anonymous or pseudonymous basis, we may be unable to satisfy your request or complete our complaints-handling process.

How is your personal information collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Applicant, Financial Data and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email, through our website or social media accounts or otherwise. This includes personal information you provide when you or your organisation:
 - purchase our products or services;
 - sell your products or services to us;
 - access certain services made available to our customers;
 - subscribe to our publications;

- [post messages or participate in discussions through our social media accounts];
- apply for employment with us;
- request marketing to be sent to you;
- enter a promotion or participate in a survey;

- give us feedback or contact us; or

- administer and/or manage any interaction, relationship or contract between you or the organisation you work for and us.

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy <https://personcentredsoftware.com/au/cookie-policy/> for further details.
- **Third parties or publicly available sources.** We may receive personal information about you from various third parties and public sources such as:
 - Technical Data from the following parties:
 - analytics providers such as Google (further information can be found here:<https://policies.google.com/technologies/partner-sites>);
 - search information providers.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Identity and Contact Data from data brokers or aggregators.
 - Identity and Contact Data from publicly available sources such as Australian Securities and Investments Commission (ASIC) and the Electoral Roll.
- **Visitors to our premises.** We will collect and process Identity and Contact Data when you visit our premises for our visitor records and primarily for security and safety reasons.
- **Use of our Wi-Fi network.** We may collect and process Technical and Usage data when you use our Wi-Fi network.
- **Telephone recordings.** We may record your phone call or Teams/Skype/Zoom meetings or similar platforms for training purposes, to ensure quality customer service and/or to provide a permanent record of the call or meeting. We will always notify you prior to recording a telephone call or meeting.

Except in the case of Customer Data, to the extent reasonably practicable and reasonable for us to do so, we collect personal information about an individual directly from that individual. Additionally, we will only collect personal information when we specifically ask for that information, except in circumstances where personal information is volunteered to us or otherwise supplied to us without us asking for such information.

Where we collect personal information on an unsolicited basis, we will comply with our statutory obligations in relation to such personal information.

How we use your personal information

As a general principle, and in accordance with our statutory obligations, we only use personal information for:

- the primary purpose for which the information was collected;

- a secondary purpose that is related to the primary purpose for which you would reasonably expect us to use the collected information; or
- as otherwise permitted or authorised by law, including the Australian Privacy Principles.

We will take reasonable steps to make individuals aware of the purpose for which the information we collect may be used by notifying individuals and customers about all relevant matters before or at the time of collection, including by reference to this Privacy Policy.

With regard to Customer Data, it is the responsibility of the customer to pass this information on to the individuals concerned and obtain all necessary consents from individuals:

- before their personal information is collected, stored, used, processed, modified or disclosed by the customer using our Mobile Care Monitoring application; and
- to the extent that personal information may be collected, stored, used, processed, modified or disclosed by us in accordance with this Privacy Policy.

Purposes for which we will use your personal information

When collecting and using personal information, our policy is to be transparent about why and how we process personal information. We have set out below a description of all the ways we plan to use your personal information.

Purpose/Activity	Type of data
To register you or your organisation as a new customer	(a) Identity (b) Contact
To provide products/services to you or your organisation	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications
To purchase products/services from you or your organisation	(c) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications
To process and deliver your or your organisation's order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications
To manage our relationship with you or your organisation which will include:	(a) Identity (b) Contact

(a) Notifying you about changes to our terms or Privacy Policy (b) Asking you to leave a review or take a survey (c) Asking to provide feedback or comment in connection with your use of our website or products and services (d) providing you with information about the products/services we provide to you or your organisation, including changes to our products or services.	(c) Profile (d) Marketing and Communications
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical
To operate interactions such as forms and flows in regard to the product/service you or your organisation operates with us	(a) Identity (b) Contact (c) Profile
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage
To make suggestions and recommendations to you about goods or services that may be of interest to you or your organisation	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications
To manage our business contact list	(a) Identity (b) Contact (c) Marketing and Communications (d) Transaction
By using the names and other personal information of representatives of corporate customers and suppliers in order to manage our interactions with those customers and suppliers	(a) Identity (b) Contact (c) Marketing and Communications (d) Transaction
By using the names and contact details of individuals who are our suppliers	(a) Identity (b) Contact (c) Marketing and Communications (d) Transaction
For security purposes	(a) Identity

To provide Wi-Fi access	(a) Technical (b) Usage
To record your phone call or Teams or similar platform meetings for training purposes, to ensure quality customer service and/or to provide a permanent record of the call or meeting	(a) Identity (b) Contact (c) Technical (d) Financial (e) Transaction
To communicate with you or your organisation generally	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications
To enable you to access certain services provided to our customers	(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage
To comply with our legal obligations including the prevention of financial crime.	(a) Identity (b) Contact (c) Transaction
To determine whether to hire you as an employee	(a) Applicant

Marketing

We may directly market ourselves and our services to you on the basis that you would reasonably expect us to do so, where we have already collected your Personal Information directly from you.

Where we collect information about you from a third party, we will not use that information to directly market to you unless you consent to this. Such consent may be express or may be implied., You will always have the opportunity to opt-out; see below. You will not be sent any unlawful marketing or spam.

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal information with any third party for marketing purposes and you will be able to opt-out at any time.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not prevent us using your personal information to contact you other than for marketing purposes (e.g. where we need to contact you or your organisation in connection with your or your organisations purchase or use of our products/services and your or your organisation's contract with us).

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://personcentredsoftware.com/au/cookie-policy/>

Disclosures of your personal information

We may share your personal information with the parties set out below for the purposes set out in the table Purposes for which we will use your personal information above.

- Companies in the same corporate group as us.
- Papworth Computer Software Limited, Company number 10199848 who are the owners of software we use to provide services to customers
- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy.

All personal information will only be transferred where there is a need to do so (for use in the course of providing services to us or you or your organisation) and these third parties will also be subject to agreements regarding the handling and use of your personal information.

We require all third parties to respect the security and confidentiality of your personal information and to treat it in accordance with the law. We do not allow these third-parties to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

In some limited circumstances, we may be legally required to share certain personal information, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, the rules of any applicable stock exchange, or the instructions of a government authority or recognised regulator.

International transfers

We will only store your personal information in Australia. This means that it will be fully protected in accordance with the Act and the Australian Privacy Principles.

However, some of our External Third Parties may be based or have servers outside of Australia so their processing of your personal information may involve a transfer of data outside Australia.

Whenever we transfer your personal information out of Australia, we do our best to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented.

We will only transfer your personal information where:

- we have taken such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information; or
- the recipient of the information is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the Australian Privacy Principles protect the information,

and there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme.

If any of the above safeguards or mechanisms are not available or implemented for a specific transfer outside Australia, we will obtain your explicit consent to the transfer.

Data security

We take the security of all personal information in our possession seriously. We take reasonable steps to protect any personal information we hold from misuse, interference and loss. We also take reasonable steps to protect the information we hold from unauthorised access, modification and disclosure.

We take reasonable physical and technology security measures and our staff are required to undertake privacy and data protection training from time to time, as part of their general obligation to respect the confidentiality and privacy of any personal information we hold.

We regularly review and update our physical and data security measures in light of current technologies and the requirements of applicable laws.

We only hold personal information we collect from or about an individual as long as reasonably necessary to fulfil the purpose(s) for which the information was collected, as required by law or in accordance with our document retention policies. When the information is no longer required to be held by us then we will take reasonable steps to destroy or de-identify the information. We implement procedures for dealing with data breaches (when personal information is accessed or disclosed without authorisation or is lost) including notifying you and/or the Office of the Australian Information Commissioner where we are legally required to do so.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal information for?

We only hold personal information we collect from or about an individual as long as reasonably necessary to fulfil the purpose(s) for which the information was collected, as required by law or in accordance with our document retention policies. When the information is no longer required to be held by us then we will take reasonable steps to destroy or de-identify the information. In some circumstances we will anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

How can you access and correct your Personal Information?

It is important that the information we hold is accurate. Except in certain situations, you have the right to access your Personal Information and ask us to correct it. We will take reasonable steps to update or correct, as soon as possible, any Personal Information in our possession that is inaccurate, incomplete, out-of-date, irrelevant or misleading.

We may refuse to grant you access where this is allowed or required by law, for example, where this would have a negative impact on someone else's privacy. If we do refuse to grant access, we will give you written reasons.

If you would like to access your Personal Information, please contact:

Privacy Officer

Suite 9, Level 2, 12 Pirie Street Adelaide SA 5000

information@personcentredsoftware.com.au

We may charge you a small fee for accessing your Personal Information, as permitted by law.

How can you complain about a breach of privacy?

You have the right to complain if you believe we have breached this privacy policy or your rights under the Australian Privacy Principles.

To lodge a complaint, please write to our Complaints Officer at the following address:

Suite 9, Level 2, 12 Pirie Street Adelaide SA 5000

information@personcentredsoftware.com.au

You can also make a complaint by:

Suite 9, Level 2, 12 Pirie Street Adelaide SA 5000

information@personcentredsoftware.com.au

We will promptly acknowledge receipt of your complaint and we will endeavour to deal with your complaint and to provide you with a response within a reasonable time period following receipt of your complaint (generally within 30 days of receipt). Where a complaint requires a more detailed investigation, it may take longer to resolve. If this is the case, then we will provide you with progress reports.

We reserve the right to verify the identity of the person making the complaint and to seek (where appropriate) further information from the complainant in connection with the complaint.

Where required by law, we will provide our determination on your complaint to you in writing.

Please note that we may refuse to investigate or to otherwise deal with a complaint if we consider the complaint to be vexatious or frivolous.

If you are not satisfied with our response, you can contact the Office of the Australian Information Commissioner: by phone (1300 363 992), post (GPO Box 5218, Sydney NSW 2001) or email enquiries@oaic.gov.au.

Further information and electronic enquiry forms can be found at <http://www.oaic.gov.au>.

How to contact PCS

If you have a query in relation to this Privacy Policy or wish to make a complaint, please contact:

Privacy Officer
Person Centred Software (Aust) Pty Limited
information@personcentredsoftware.com.au

Phone: 1300 389 792

Glossary

So that we can be completely clear, here are some words we use which have specific meanings:

Term	Definition
Australian Privacy Principles	the Australian Privacy Principles under the Privacy Act.
Notifiable Data Breaches Scheme	the Notifiable Data Breaches Scheme under the Privacy Act.
Personal Information	information or an opinion, whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. Personal Information is information about an individual or natural person. Information on companies or other legal entities is not Personal Information. Personal Information includes Sensitive Information and Health Information.
Privacy Act	the <i>Privacy Act 1988</i> (Cth).
Sensitive Information	includes Health Information and Personal Information about an individual's racial origin, ethnic origin, political opinions, membership of a political association, religious belief or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, sexual practices or criminal record.
External Third Parties	<ul style="list-style-type: none"> • Service providers who provide IT and system administration services and other business services to us, for example, Microsoft Azure, who we currently use to host the Mobile Care Monitoring application. • Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services to us. • . • Analytics and search engine providers who assist us in the improvement and optimisation of our website. • Subcontractors, partners, agents and other persons who need access to and will use your data in the course of providing services to you or your organisation and for the purposes we specify.