

## Privacy Policy

At The Procure Group Pty Ltd (ABN 60 088 819 872), we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) (**Privacy Act**), the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (**Privacy Amendment Act**) and the Australian Privacy Principles (**APPs**).

This Privacy Policy applies to personal information collected by us and explains how we collect, use, disclose and handle it as well as your rights to access and correct your personal information and make a complaint for any breach of the APPs.

### What is Personal Information?

The Privacy Act defines personal information to mean: "information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether recorded in a material form or not."

### What is Sensitive Information?

"Sensitive information" is a subset of personal information and means: "information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, 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 about an individual, genetic information, biometric information or templates."

### What kinds of personal information do we collect and hold?

The kinds of personal & sensitive information we collect and hold vary depending on the services we are providing, but generally can include:

- Your contact information such as full name, e-mail address, residential and postal addresses, and phone numbers;
- Details relating to any employment (if applicable) including previous employment;
- Your date of birth;
- Medical history and health information;
- Claims and insurance history;
- Other information specific to our services such as information provided to us by insurers, legal advisors, self insured entities, employers, and the relevant statutory bodies such as WorkCover, or information gathered from any third parties in the course of our services;
- Details of any criminal history; and
- Details of any membership of a professional or trade association.

### How do we collect and hold personal information?

We only collect personal information by lawful and fair means and where it is reasonably necessary for, or directly related to, one or more of our functions or activities.

Unless it is unreasonable or impracticable for us to do so, or as provided otherwise under this Privacy Policy, we will collect your information directly from you or your agent such as a legal adviser or indirectly through relevant organisations from whom we are entitled to receive it – for example insurers, legal advisers, WorkCover, Comcare, employers etc.

We attempt to limit the collection and use of sensitive information from you unless we are required to do so in order to carry out the services provided to you.

We hold the personal information we collect within our own data storage devices or with a third party provider of data storage. We discuss the security of your personal information below.

### The purposes for which we collect, hold, use and disclose your personal information

We collect, hold, use and disclose your personal information where it is reasonably necessary for, or directly related to, one or more of our functions or activities. These will usually include our suite of insurance support services including rehabilitation services, injury management services and training. We do not use or disclose personal information for any purpose that is unrelated to our services and that you would not reasonably expect (except with your consent). We will only use your personal information for the primary purposes for which it was collected or as consented to.

We usually disclose personal information to third parties who assist us or are involved in the provision of our services and your personal information is disclosed to them only in connection with the services we provide to you or with your consent.

The third parties can include our related companies, our agents or contractors, insurers, their agents and others they rely on to provide their services and products. These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them and we take such steps as are reasonable to ensure that they are aware of the provisions of this Privacy Policy in relation to your personal information. If we give third parties (including their agents, employees and contractors) your personal information, we require them to only use it for the purposes we agreed to.

### What if you do not provide some personal information to us?

If the required personal information is not provided, we or any involved third parties may not be able to provide appropriate services or products. If you do not provide the required personal information we will explain what the impact will be.

### How do we manage the security of your personal information?

We take reasonable steps to ensure that your personal information is safe. We retain personal information in hard copy records and electronically with us or our appointed data storage provider(s). You will appreciate, however, that we cannot guarantee the security of all transmissions of personal information, especially where the internet is involved. Notwithstanding the above, we endeavor to take all reasonable steps to:

- protect any personal information that we hold from misuse, interference and loss, and to protect it from unauthorised access, modification or disclosure both physically and through computer security measures;
- destroy or permanently de-identify personal information in accordance with the Privacy Act.

We maintain computer and network security; for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to computer systems.

### Data quality

We take reasonable steps to ensure that personal information is current, accurate, up-to-date and complete whenever we collect or use or disclose it.

Throughout our dealings with you we will take reasonable steps to confirm the details of your personal information we hold and ask you if there are any changes required.

The accuracy of personal information depends largely on the information you provide to us, so we rely on you to:

- let us know if there are any errors in your personal information you become aware of; and
- keep us up-to-date with changes to your personal information (such as your name or address).

### Access to and correction of your personal information

You may be entitled to have access to any personal information relating to you which we possess, except in some circumstances provided by the Act or in law. For example, we may refuse access where:

- the information may have an unreasonable impact on the privacy of others;
- the request is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings and would not be accessible by the process of discovery in those proceedings;
- the information would reveal our intentions in relation to negotiations in such a way as to prejudice those negotiations;
- denying access is required or authorised by or under an Australian law or a court/tribunal order; and/or
- providing access would reveal evaluative information generated by us in connection with a commercially sensitive decision-making process.

If we make a correction to your personal information we may retain a copy of the previous information for our records or as required by law.

If you wish to access your personal information please write to The Privacy Officer, The Procure Group Pty Ltd, [info@procuregroup.com.au](mailto:info@procuregroup.com.au).

In most cases we do not charge for receiving a request for access to personal information or for complying with a correction request.

### Do we transfer information overseas?

Any personal information provided to The Procure Group may be transferred to, and stored at, a destination outside Australia, including but not limited to New Zealand, Singapore, United Kingdom, the Philippines and the United States of America. Details of the countries we disclose to may change from time to time. Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

When we send information overseas, in some cases we may not be able to take reasonable steps to ensure that overseas providers do not breach the Privacy Act and they may not be subject to the same level of protection or obligations that are offered by the Act. By proceeding to acquire our services you agree that you cannot seek redress under the Act or against us (to the extent permitted by law) and may not be able to seek redress overseas. If you do not agree to the transfer of your personal information outside Australia, please contact us.

### Our Website

You are able to visit our website without providing any personal information. We will only collect personal information through our websites with your prior knowledge for example where you submit an enquiry or application online. Email addresses are only collected if you send us a message and will not be automatically added to a mailing list.

### Cookies

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use may identify individual users.

- Cookies can either be "persistent" or "session" based. Persistent cookies are stored on your computer, contain an expiration date, and are mainly for the user's convenience.
- Session cookies are short-lived and are held on your browser's memory only for the duration of your session; they are used only during a browsing session, and expire when you quit your browser.
- We may use both session and persistent cookies. This information may be used to personalise your current visit to our websites or assist with analytical information on site visits.
- Most internet browsers can be set to accept or reject cookies. If you do not want to accept cookies, you can adjust your internet browser to reject cookies or to notify you when they are being used. However, rejecting cookies may limit the functionality of our website.

### Complaints

If you do have a complaint about privacy we ask that you contact our office **first** to help us to assist you promptly. In order to resolve a complaint, we:

- Will liaise with you to identify and define the nature and cause of the complaint;
- Will keep you informed of the likely time within which we will respond to your complaint;
- Will inform you of the reason for our decision in resolving such complaint; and
- Keep a record of the complaint and any action taken in the Register of Complaints.

If you have a complaint in relation to a 'Claimant Handling and Settling Service', please make your complaint by:

- Calling Us on (02) 9086 8000 and one of our staff will assist you to obtain sufficient details to complete the above Complaint Form.
- Writing to us at: Level 1, Building 3, 190 Bourke Rd, Alexandria, NSW 2015

If you have a complaint that does not relate to a 'Claims Handling and Settling Service' please make your complaint by:

- Emailing us on [info@procuregroup.com.au](mailto:info@procuregroup.com.au)
- Calling Us on (02) 9086 8000
- and one of our staff will assist you to obtain sufficient details to complete the above Complaint Form.
- Writing to us at: Level 1, Building 3, 190 Bourke Rd, Alexandria, NSW 2015

When we make our decision, if you are not satisfied, we will also inform you of your right to take the matter to the Australian Financial Complaints Authority (AFCA) or the Office of the Australian Information Commissioner (OAIC). In addition, if you have not received a response from us of any kind to your complaint within 30 days, then you may have the right to take the matter to AFCA or the OAIC (contact details are provided below). If you would like further details of our Privacy Complaints Handling Procedure, please contact our Privacy Officer using the contact details listed above.

### How to contact us

If you wish to gain access to your personal information, want us to correct or update it, have a complaint about a breach of your privacy, or have any other query relating to our Privacy Policy, contact our Privacy Officer during business hours on:

**Telephone:** (02) 9086 8000  
**Facsimile:** (02) 9086 8001  
**Email:** [info@procuregroup.com.au](mailto:info@procuregroup.com.au)  
**Mail:** Attn: Privacy Officer, PO Box 7006, South Sydney Hub NSW 2015

We welcome your questions and comments about privacy. This Privacy Policy is current from 1 October 2021.

In the event that this Privacy Policy or any part thereof is amended or modified in the future, the revised version will be available by contacting our office or on our website.

### How to contact AFCA

Website: [www.afca.org.au](http://www.afca.org.au)  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

### How to contact OAIC

You can also obtain information on privacy issues in Australia on the Office of the Australian Information Commissioner ("OAIC") website at [www.oaic.gov.au](http://www.oaic.gov.au) or by contacting the OAIC by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or by calling on 1300 363 992.