

Privacy Policy – External

WentWest Limited (**WentWest**) is committed to protecting the privacy of the personal information and sensitive information which it collects and holds. It is our organisational objective for better integration, coordination and continuity of care. This requires the appropriate use of information over a period of time and care.

WentWest must comply with the Australian Privacy Principles under the Privacy Act 1988 (Cth), and other privacy laws which govern the way in which organisations (such as WentWest) hold, use and disclose personal information (including sensitive information).

The purpose of this Privacy Policy is to explain:

- the application of this Privacy Policy;
- the kinds of information that WentWest may collect about its clients and how that information is collected and used;
- how WentWest can disclose the information which it has collected;
- how individuals can access the information WentWest holds; and
- the way in which WentWest protects the personal information it holds.

Definitions

In this Privacy Policy the following terms have the following meanings:

health information is:

- personal information or an opinion about:
 - an individual's physical or mental health or disability (at any time);
 - an individual's express wishes about the future provision of health services for themselves; or
 - a health service provided, or to be provided, to an individual;
- other personal information collected to provide, or in providing a health service;

personal information means 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 the information or opinion is recorded in a material form or not;

sensitive information means:

- personal information or opinion about an individual's:
 - racial or ethnic origins;

- political opinions or political associations;
- philosophical beliefs or religious beliefs or affiliations;
- sexual orientation or practices;
- criminal record; or
- health information about an individual; or
- genetic information about an individual that is not otherwise health information.

Collection and use of Personal Information

Types of personal information collected by WentWest

WentWest collects information from its clients which is reasonably necessary to facilitate the provision of health-related services and support. This includes collecting personal information such as a client's name, address, and may also include his or her health history, past and current treatments, cultural background and lifestyle factors. We may also obtain information about any programs in which a client is, or has been, involved or other support he or she may be receiving, such as financial or health related support.

WentWest may also collect personal information from individuals involved in providing any health-related services or initiatives (such as contractors, medical practitioners, allied health professionals, trainees and volunteers) and from job applicants where necessary to assess and engage them and possibly to consider engagement at a future point in time. The types of personal information we collect from job applicants includes name, address, professional experience, qualifications, references and past employers, and any other information which is necessary for us to assess suitability for employment/engagement with WentWest.

How we collect personal information

Given the nature of WentWest's services, we may receive some personal information from third parties particularly where a client has been referred to take part in WentWest's programs (such information may include the client's name, contact details and any relevant information about the client pertaining to the program into which he or she has been referred). Any other information which WentWest may need will be collected personally from the individual by WentWest (either face to face, by telephone or electronically).

WentWest will only collect personal information which is reasonably necessary to appropriately facilitate the provision of its services and appropriately operate and manage its business.

How WentWest uses personal information

WentWest only uses an individual's personal information for the purpose for which it was collected by

WentWest (**primary purpose**), unless:

- there is another purpose (secondary purpose) and that secondary purpose is directly related to the primary purpose, and the individual would reasonably expect, or WentWest has informed the individual, that the information will be used for that secondary purpose;
- the individual has given his or her consent for the personal information to be used for a secondary purpose; or
- WentWest is required or authorised by law to use the individual's personal information for a secondary purpose (including for research and quality improvements within WentWest).

For example, WentWest may use a client's personal information to:

- facilitate the provision of any WentWest supported service which the client has requested;
- arrange for a client's participation in any program operated or supported by WentWest;
- provide any ongoing support to the client;
- manage its business operations, including insurances and legal obligations;
- communicate with the client; and
- help us run our organisation (such as improving our services or security, training our staff, or developing further services).

Complete and accurate details

If we do not collect a client's personal information, we may not be able to provide the client with, or engage the client in, the services, support or assistance the client has requested. If the personal information the client provides us is incomplete or inaccurate, we may not be able to assist in providing the services or support to the client, or have the client involved in providing any services.

Disclosing Personal Information

WentWest will confine its disclosure of personal information to the primary purpose for which that information has been collected, or for a related secondary purpose. This includes when disclosure is necessary to facilitate the provision of services which the client has requested, assist us in running our organisation, or for security reasons.

We may provide a client's personal information to:

- organisations with whom WentWest has contracted to assist in providing the services requested by the client;
- any third parties who are involved in a client's ongoing healthcare (such as the client's general practitioner, specialist and carer);
- anyone authorised by the client to receive his or her personal information (the consent may be express or implied);
- outsourced service providers who perform functions on our behalf; and
- anyone WentWest is required by law to disclose a client's personal information to.

If we disclose personal information to any third parties, including overseas recipients, we will only do so in compliance with Australian privacy laws. This extends to taking reasonable steps to ensure that those third parties comply with applicable Australian privacy laws in using personal information.

Data Storage, Quality and Security

Data quality

WentWest will take reasonable steps to ensure that personal information which is collected, used or disclosed is accurate, complete and up to date.

Storage

All personal information is stored by WentWest securely in either hard copy or electronic form. WentWest may also use a third-party to store copies of personal information off site. WentWest will take all reasonable steps to ensure that any personal information stored off-site is stored securely.

Data security

WentWest strives to ensure the security, integrity and privacy of personal information, and will take reasonable steps to protect an individual's personal information from misuse, interference, loss, unauthorised access, modification or disclosure. WentWest reviews and updates (where necessary) its security measures considering current technologies.

Online transfer of information

While WentWest does all it can to protect the privacy of an individual's personal information, no data transfer over the internet is 100% secure. When personal information is shared with WentWest via an online process by an individual, it is at that individual's risk.

There are ways individuals can help maintain the privacy of his or her personal information, including:

- always closing the browser at the end of a user session;
- always ensuring others cannot access his or her personal information and emails when using a public computer; and
- never disclosing user names and passwords to third parties.

Use of cookies

A 'cookie' is a small data file placed on a user's machine or device which lets WentWest identify and interact more effectively with a computer. Cookies do not identify individual users, but they do identify ISPs and browser types.

Cookies which are industry standard and are used by most web sites, including those operated by WentWest, can facilitate a user's ongoing access to and use of a site. They allow WentWest to customise our website to our clients' needs.

If individuals do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows the individual to deny or accept the cookie feature. However, cookies may be necessary to provide users with some features of our on-line services via the WentWest website.

Links to other Sites

WentWest may provide links to third party websites. These linked sites are not under our control, and WentWest is not responsible for the content or the privacy practices employed by those websites.

Before an individual discloses personal information on any other website, we recommend that the terms and conditions of use and privacy statement of the relevant website be read carefully.

Accessing and amending Personal Information

Individuals have a right to access the personal information which WentWest holds about them. If an individual makes a request to access his or her personal information, WentWest will ask the individual to verify his or her identity and specify the information he or she requires.

Individuals can also request an amendment to any of their personal information if they consider that it contains inaccurate information.

Individuals should be directed to contact WentWest about any privacy issues as follows:

By email: privacy@wentwest.com.au

By telephone: (02) 8811 7100

By mail: Attention: Privacy Officer
WentWest Limited
PO Box 5
Blacktown Post Shop NSW 2148

Complaints

If an individual has a complaint about WentWest's information handling practices or considers WentWest has breached his or her privacy, they can lodge a complaint with:

- the WentWest Privacy Officer, on the contact details listed above; or
- the Office of Australian Information Commissioner.

8th January 2019