

Privacy Policy of Premier Hearing Pty Ltd

Who we are?

Premier Hearing Pty Ltd as Trustee for Premier Hearing Trust (**Premier Hearing**) is an accredited service provider for the supply of hearing services to Clients under section 20 of the *Hearing Administration Act 1997* (Cth).

Premier Hearing contact details are as follows;

- telephone: +61 2 6651 1227; or
- facsimile: +61 2 6650 0901; or
- e-mail: admin@premierhearing.com.au; or
- mail or personally 63 Grafton Street, Coffs Harbour 2450, Australia

Premier Hearing is dedicated to helping people manage their hearing impairment so they have a better quality of life. We provide a full range of subsidised hearing care for eligible people, pensioners, concession card holders and most veterans and defence personnel.

These services are provided under the Australian Government Hearing Services Program administered by the Department of Health through the Office of Hearing Services (**OHS**) and include assessing hearing, fitting hearing devices and providing counselling and rehabilitation programs.

Premier Hearing can also assist people who are not eligible for government subsidies.

Our approach to privacy.

We are committed to protecting your privacy and being open and transparent about how we handle your Personal Information.

This Privacy Policy outlines how we manage the Personal Information we hold about you in accordance with our obligations under the Commonwealth *Privacy Act 1988* (as amended) and the Australian Privacy Principles (**APPs**).

The APPs regulate how we must collect, use, disclose, store and secure your Personal Information. The APPs also give individuals the right to access and correct their Personal Information in certain circumstances.

Who should read this Privacy Policy?

You should read this Privacy Policy if you are:

- seeking access to, or receiving our hearing and/or related services
- an individual whose Personal Information may be given to, or held by, us
- a contractor, consultant, supplier or vendor of goods or services to **Premier Hearing**
- seeking employment with us

What kind of Personal Information do we collect?

Due to the nature of the hearing and related services and products we provide we routinely ask for a range of Personal Information from our clients and others.

The type of Personal Information we may collect can include (but is not limited to) your name, address, date of birth, contact details (including telephone numbers (landline and mobile), email

addresses, gender, Pensioner number, Department of Veterans' Affairs number, and payment details.

Some personal information we collect is sensitive.

"Sensitive Information" may include information or an opinion about your hearing and health condition and history, or your racial or ethnic origin. We may also collect indigenous and culturally and linguistically diverse identifiers to help us deliver better services to clients in culturally appropriate ways (eg. use of interpreters or specialist officers).

For the purpose of this policy **Personal Information** refers to both Personal Information and Sensitive Information.

Why we collect your Personal Information.

Our business is to understand and meet our clients' hearing needs and deliver a range of hearing and related services. To do this effectively we need to collect certain Personal Information about you. **Premier Hearing** collects Personal Information about you for the primary purpose of providing you with hearing and related services and other secondary purposes such as marketing, and conducting market research.

If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, we may not be able to meet your hearing service needs.

When and how we collect Personal Information.

We collect your Personal Information to allow us to understand and meet your hearing needs and deliver a range of hearing and related services. We may collect your Personal Information when you:

- attend hearing screenings or hearing assessments
- complete application, consent or other forms
- request us to complete applications on your behalf (eg online voucher applications)
- visit our website
- register for our products or services
- request information about us, our products or our services
- provide feedback
- apply for a position of employment with us
- fill in a form on our website or email us from our website, or
- contact us by telephone, SMS, fax, email, post or in person.

We may also collect Personal Information about you from third parties (such as your medical provider). However before doing so we will seek your consent unless authorised or required to collect the information under an Australian law.

We may also collect Personal Information about you from other third parties (e.g. family members or guardians). However we will only collect your Personal Information in this way if it is unreasonable or impractical to collect this information directly from you or if we are otherwise permitted to do so.

We are committed to continuous improvement and may ask for other information voluntarily from time to time (e.g. through customer satisfaction surveys, market research or special offers) to enable us to improve our services and consider the wider needs of our clients or potential clients.

How we use your Personal Information.

We may use the Personal Information we collect about you for the primary purpose and related purposes including:

- verifying your identity
- assessing your eligibility for the Australian Government Hearing Services Program (through the Office of Hearing Services)
- applying to the Office of Hearing Services for a hearing services voucher on your behalf and managing your Personal Information on their online system
- contacting your health practitioner to arrange a referral appointment for a hearing assessment or other related service
- reviewing your ongoing needs
- ordering and administration of products from third party suppliers
- complaints management and co-ordination of feedback
- managing and responding to requests for information (including requests under the *Freedom of Information Act*, the *Privacy Act* and under various confidentiality provisions under which we operate)

We also may use it for the secondary purposes of:

- conducting market research, product development or customer satisfaction surveys
- statistical analysis to improve service delivery
- marketing products and services we think you may be interested in

We may also contact you for feedback, or to obtain your consent to use your details in our marketing and consumer research activities.

If you apply for a position of employment with us, we will use your personal information to assess your application and we may use it to contact you about any future employment opportunities with us.

We may collect and use your Personal Information for other purposes not listed above. If we do so, we will make it known to you at the time we collect or use your Personal Information.

Disclosing Your Personal Information to Other Parties.

We will not disclose your Personal Information without your permission, unless the disclosure is:

- in accordance with this Privacy Policy or any agreement you enter into with us
- required or authorised by law, or
- otherwise permitted by the Australian Privacy Principles (APPs).

Depending on the nature of your engagement with us, we may disclose your Personal Information to third parties that provide products and services to us or through us, or to other third parties.

Premier Hearing may also disclose your Personal Information to:

- any person you request or consent to receiving the information
- suppliers to **Premier Hearing** of products to be supplied to you (e.g. manufacturers of hearing aids, ear moulds, Cochlear implants or other related products)
- third party contractors, consultants or vendors engaged to provide hearing or other services to you on **Premier Hearing's** behalf
- your health practitioner or other hearing service providers
- your family members unless you advise us of a Court or tribunal order restricting this disclosure

- the Office of Hearing Services for assessing your eligibility, processing your voucher application or for audit purposes
- relevant officers of the Commonwealth, State or Territory Governments (such as Departments of Health, Veterans' Affairs, Defence, Education, Employment, or Medicare)
- the Office of the Australian Information Commissioner (**OAIC**) or other law enforcement agencies
- other individuals or agencies as **Premier Hearing** is required, or authorised to, by law.

We will not disclose your Personal Information to overseas recipients.

Premier Hearing does not accept responsibility for use or disclosure of your Personal Information in circumstances beyond our control.

Marketing.

We may use your Personal Information to send you information, including promotional material, about us or our products and services or products which we think may be of interest to you. We may send such information by means of mail, email, SMS and MMS messages. If you do not wish to receive marketing or promotional material from us, you can contact us by mail, phone (during business hours) or email (as set out in this Policy) or via our website.

Management of your Personal Information.

We take all reasonable steps to ensure that the Personal Information we hold is accurate, complete, relevant and up to date.

We train our employees who handle Personal Information to respect the confidentiality and privacy of your information.

How we hold and secure Your Personal Information.

We aim to keep your Personal Information secure. Safeguarding the privacy, security and integrity of your Personal Information is important to us.

We hold your Personal Information in both paper and electronic form. We take reasonable steps to protect the Personal Information we hold from misuse, interference, loss, and from unauthorised access, modification or disclosure. These steps include:

- holding paper records securely in accordance with Australian government security guidelines
- accessing Personal Information on a need-to-know basis, by authorised personnel
- ensuring our premises have secure access
- ensuring storage and data security systems and protections are regularly audited

Any Personal Information that we collect from our website or which we hold on our computer systems is stored in secure data storage facilities onshore in Australia and protected in accordance with Australian Government standards on the classification, protection and management of data.

We may need to retain records for a significant period of time to comply with our legal obligations. If we find that we have no further need for your Personal Information we may archive it in accordance with our record retention obligations or securely destroy all record of it.

How to Access, Update and Correct your Personal Information.

You are entitled to access Personal Information that we hold about you. Before we can consider an access request you will need to complete an application form verifying your identity and specifying what information you require. A request for access can be made free of charge by contacting us as set out below. On receipt of your written request, we will respond within 30 days.

Ordinarily we will give you full access to your Personal Information. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal.

We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us. Please contact us if you believe that the Personal Information is inaccurate or incomplete. We will respond to your request within 30 days and use all reasonable efforts to correct your Personal Information.

How to contact us if you have a question, problem or complaint about our use of your Personal Information or this Privacy Policy.

If you feel that your privacy has not been respected or that we have conducted ourselves inconsistently with this Privacy Policy, or for any other queries in relation to this Privacy Policy, please contact us by:

- telephone: +61 2 6651 1227; or
- facsimile: +61 2 6650 0901; or
- e-mail: admin@premierhearing.com.au; or
- mail: 63 Grafton Street, Coffs Harbour 2450, Australia

Please include a contact phone number so we can respond to your enquiry or concern.

If you have a complaint we will investigate your complaint and notify you of the outcome of our investigation within a reasonable time. We will let you know if we can resolve the matter quickly or whether we need more time to investigate and resolve your complaint. In all cases, we will inform you of the progress of your complaint.

How to make a complaint to the Office of the Australian Information Commissioner.

If you are not satisfied with our response you can contact the Privacy Commissioner who is part of the Office of the Australian Information Commissioner.

You can contact the Privacy Commissioner by:

- phone: 1300 363 992
- email: enquiries@oaic.gov.au
- post: Sydney Office – GPO Box 5218 Sydney NSW 2001 or
- post: Canberra Office – GPO Box 2999 Canberra ACT 2601

You may make a complaint directly to the Privacy Commissioner rather than to us however it is generally necessary to have provided us with an opportunity to address your complaint in the first instance.

Information collected via our website.

We will not collect any Personal Information about users of our website except when they knowingly provide it or as otherwise described below.

Click Stream Data

When you visit and browse our web site, our website host may collect information for statistical, reporting and maintenance purposes. The information collected by our website host is used to administer and improve the performance of our website and will not be used to identify you. The information may include:

- the IP address of your computer;
- the date, time and duration of the visit to the site
- the pages accessed and documents downloaded
- the previous site visited, and
- the type of browser used.

Cookies

“Cookies” are small text files that may be transferred to your computer’s hard drive by the websites you visit for the purpose of tracking and storing information about a user’s identity, browser type or website visiting patterns.

Cookies may be used on our website to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our website.

Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using. If you access our website or click-through an email we send you, a cookie may be downloaded onto your computer’s hard drive.

Cookies may also be used for other purposes on our website but in each case none of the information collected can be used to personally identify you. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.

If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

Web Beacons

Web beacons are images that originate from a third party site to track visitor activities. We may use web beacons to track the visiting patterns of individuals accessing our website.

Email address

We will record your email address if you provide it to us or send us a message. It will be used for the purpose for which you have provided it and may be added to our mailing list. It will not be used for any other purpose and we will not disclose it without your consent. You are reminded that email sent over the Internet is not secure, and could be intercepted without your knowledge. **Premier Hearing** has other methods of receiving information such as mail, fax and telephone and you may prefer to use one of these methods.

Link to other Sites

External sites that are linked to or from the **Premier Hearing** Internet site are not under our control and may collect your Personal Information so you are advised to view their privacy collection notices separately. **Premier Hearing** is not responsible for any content contained in any external websites, or accidental or malicious damage that may arise to your local systems, data, software or hardware through accessing **Premier Hearing**’s website or any external websites and their content.

Updates to this Policy.

This Policy will be reviewed from time to time to take into account new laws and technologies, changes to our operations and business environment. The most current version of this Policy can be accessed from www.premierhearing.com.au or can be provided to you on request.

We encourage you to check this page from time to time for any changes.

This Policy was last updated on 28 July 2014.