

TUNSTALL AUSTRALASIA PTY LTD

Privacy Policy

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Privacy Policy Document History

Revision History

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Approvals

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1. About this policy

1.1. Purpose

The purpose of this privacy policy is to:

- clearly communicate the personal information handling practices of Tunstall Australasia Pty Ltd and Tunstall New Zealand Limited;
- provide individuals with a better and more complete understanding of the sort of personal information that Tunstall holds, and the way we handle that information.

1.2. Responsibility

Tunstall's Privacy Policy is the responsibility of the Corporate Development Manager, Tunstall Australasia Pty Ltd.

1.3. If you don't have time to read the whole policy

This privacy policy is based on a 'layered policy' format, which means that it offers layers of greater or lesser detail so people can read as much as they wish and find what they need fast.

If all you want is a snapshot of our personal information handling practices, you can have a look at our **7.0 Privacy Statement** or our condensed privacy policies; **5.0 Condensed Privacy Policy Australia** or **6.0 Condensed Privacy Policy New Zealand**. These condensed policies offer an easy to understand summary of:

- how we collect, use, disclose and store your personal information; and
- how you can contact us if you want to access or correct personal information we hold about you.

Tunstall's full privacy policy below provides a more comprehensive explanation of our information handling practices. This document forms the 'detailed' layer of our privacy policy.

1.4. Outline of this policy

2.0 Our Personal Information Handling Practices

Explains our general information handling practices across Tunstall including information about how we collect, use, disclose and store your personal information.

3.0 Organisational Files

Explains in detail our personal information handling practices in relation to specific Tunstall functions or activities.

4.0 Information collected online by Tunstall

Explains our personal information handling practices when you visit our websites or interact with Tunstall via email, or social media.

¹ The Layered Privacy Notices format was endorsed by Data Protection & Privacy Commissioners in 2003, further developed in the Berlin Memorandum and endorsed in Opinion WP 100 by the Article 29 Committee of European Data Protection Commissioners.

2. Our Personal Information Handling Practices

2.1. Our obligations under the Privacy Acts

This privacy policy sets out how we comply with our obligations under the Privacy Acts of Australia and New Zealand. Tunstall Australasia and Tunstall New Zealand as private companies delivering services across the Australia and New Zealand economic zone, are required to comply with the Australian Privacy Principles (APPs) Privacy Act 1988, and the principles of the New Zealand Privacy Act 1993; which regulate how we may collect, use, disclose and store personal information, and how individuals may access and correct personal information held about them.

In this privacy policy, 'personal information' has the same meaning as defined by section 6 of the Privacy Act 1993 (Australia):

“information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.”

In this policy “Tunstall” is generically used to represent both corporate entities, Tunstall Australasia Pty Ltd. and Tunstall New Zealand Ltd.

2.2. Collection

It is our usual practice to collect personal information directly from the individual or their authorised representative.

Sometimes we collect personal information from a third party or a publicly available source, but only if the individual has consented in writing to such collection or would reasonably expect us to collect their personal information in this way, or if it is necessary for a specific purpose such as the provision of a monitoring service.

In certain circumstances we receive personal information about third parties from individuals who contact us and supply us with the personal information of others in the documents they provide to us for example, the provision of family contact details as responders.

Individuals have the option of not identifying themselves, or of using a pseudonym, when dealing with Tunstall in relation to a particular matter where it is practical to do so; except where it is in relation to the delivery of financial services, access to secure information or the delivery of telehealthcare services.

We only collect personal information for purposes which are directly related to our functions or activities under the Australian and New Zealand Privacy Acts, and the Australian Health Identifiers Act 2010; and only when it is necessary for or directly related to such purposes.

We also collect personal information related to employment services, human resource management, and other corporate service functions. These purposes are listed below:

2.3. Customer Service and Sales:

- Coordinating customer referrals.
- Coordinating installation and decommissioning services.

- When an individual contacts us asking for information, advice about Tunstall products and/or services.
- When an individual requests a quotation for Tunstall products and/or services.
- Shipping equipment to individuals.
- Assisting with individuals with technical support and advice.

2.4. Public awareness and education:

- When people ask to be on an email or mailing list so that Tunstall can send them information about its activities and publications, for example:
 - when we record who we have had contact with in relation to media or other public relations events;
 - when we conduct events.
- When we deliver training, attendance and/or attainment will be recorded.

2.5. Administrative and Financial activities:

- When we process financial details for the delivery of services and/or equipment.

We also collect personal information (including contact details) as part of our normal communication processes directly related to those purposes, including:

- when an individual emails, mails or faxes staff members;
- when an individual telephones us;
- when an individual hands us their business card.

2.6. Telehealthcare activities:

- Individuals personal and relevant medical information to enable the provision of telehealthcare services.
- A register of equipment and services provided to the individual.
- Contact information of responders who are listed as key contacts in the event of an emergency.
- Contact information of key support staff of community care agencies or general practices or other healthcare professionals.

2.7. Human Resource Activities:

- General staff employment records:
 - Employment contracts;
 - Payroll records;
 - Staff training activities and records including certifications;
 - Activities and communications regarding recruitment of staff;
 - Employee wellness program (refer 2.6 telehealthcare activities).
- WH&S activities and incidents.
- Internal emails and communications.

For more detailed information about these purposes and the information handling practices that apply to them, see section **3 Organisational Files**

How we handle specific types of files that contain personal information

2.8. Use and disclosure

We only use personal information for the purposes for which it was given to us, or for purposes which are directly related to one of our functions or activities, and we do not give it to organisations, government agencies, or anyone else unless one of the following applies:

- the individual has consented,
- the individuals' image may be captured and stored on file for the purpose of security identification,
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies,
- it is otherwise required or authorised by law,
- it will prevent or lessen a serious and imminent threat to somebody's life or health,
- it is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.

Tunstall participates in research programs, and may be required to provide data to researchers for the purpose of conducting research analytics. In such circumstances, data will be provided in line with methods approved by the research program's Human Research Ethics Committee (HREC) and based on the expectations and permissions provided by the participants. Where data is required by the HREC to be anonymous, Tunstall will ensure the data is appropriately de-identified, and securely transmitted to the research organisation.

2.9. Data quality

We take steps to ensure that the personal information we collect is accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by individuals or an authorised third party that their personal information has changed, and at other times as necessary.

2.10. Data security

We take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure, and against other misuse. These steps include password protection for accessing our electronic IT system, securing paper files in locked cabinets, transfer of data by secure means, and other physical access restrictions.

When no longer required, personal information is destroyed in a secure manner, or deleted according to Tunstall's Records Disposal Policy and Procedures.

2.11. Access and correction

If an individual requests access to the personal information we hold about them, or requests that we change that personal information, delete or update an image, or remove them from a contact list, we will allow access or make the changes unless we consider that there is a sound reason under the Australian or New Zealand Privacy Acts, or other relevant law to withhold the information, or not make the changes.

If we do not agree to make requested changes to personal information the individual may make a statement about the requested changes and we will attach this to the record.

Individuals can obtain further information about how to request access or changes to the information we hold about them by contacting us (see details below).

2.12. How to contact us

Individuals can obtain further information in relation to this privacy policy, or provide any comments, by contacting us:

Tunstall Australasia Pty Ltd t/as Tunstall Healthcare contact details:

Telephone 1800 603 377 (or from outside Australia +61 7 36372200)

Assisted Contact If you have a hearing or speech impairment, contact us through the [National Relay Service](#):
TTY users phone 133 677 then ask for 1800 603 377
Speak and Listen users phone 1300 555 727 then ask for 1800 603 377
Internet relay users [connect to the NRS](#) then ask for 1800 603 377
Interpreter Service call TIS on 131 450 (Call charges may apply)

Post Locked Bag 1, Kingsford Smith Drive, Eagle Farm QLD 4009

Facsimile 07 3637 2255

Email privacy@tunstallhealthcare.com.au

Tunstall New Zealand Limited t/as Tunstall New Zealand contact details:

Telephone 0800 488 678

Assisted Contact TTY/Voice Carry Over/Hearing Carry over users phone 0800 4 711 711 then ask for or type instructions to connect to 0800 488 678
Interpreter Services call Interpreting New Zealand 0508 468 377 (Call charges may apply)

Post PO Box 13153, Tauranga 3141

Facsimile (07) 571 2685

Email privacy@tlcare.co.nz

3. Organisational Files

How we handle specific types of files that contain personal information.

3.1. Telehealthcare Customer Information files

3.1.1. Purpose

We collect personal information to enable us to:

- respond to enquiries,
- establish services for users,
- provide equipment to users,
- provide telehealthcare monitoring and/or triage services for users,
- provide technical support for users.

We collect personal information from telephone and written enquiries and applications, enrolment/activation forms, change of service and decommission requests.

We collect personal information where privacy complaints are made to enable us to assess, make preliminary enquiries, investigate, conciliate or determine these complaints. We use that personal information to ensure that we are accountable for the way we handle those matters.

We collect personal information to enable us to provide equipment and services on behalf of community care agencies, government agencies and other organisations or third parties acting on behalf of the user.

We record all interaction with users, their support agencies and responders; this may be by way of recorded phone conversations, alarm calls, file notes, paper forms, faxes and emails. We provide reports on user activity to support agencies to enable them to provide appropriate support and care services to users.

The personal information held about users, their authorised representatives, responders and support agencies may be captured in support databases, electronic files and/or paper files.

3.1.2. Collection

We collect personal information directly from telehealthcare service users, their authorised representatives, responders, care agencies or government agencies; solely for the purpose of providing telehealthcare services. Some information is collected via automatic means of data transmission from telehealthcare devices via telephony, GSM, GPRS, GPS, or IP data transmission.

3.1.3. Use and disclosure

We only use the personal information we collect to carry out our designated services or provision of products e.g. emergency response services for medical alarms, telecare, lone/mobile workers, triage services for remote vital sign monitoring and telehealth, image capture for the purposes of identification or diagnosis, or to enable technical support.

Tunstall has a duty of care to its telehealthcare customers, and as such may hold personal information in both Australia and New Zealand to enable the seamless and continuous delivery of our telehealthcare services by either entity.

We may use the personal information we hold to make contact with the user, their authorised representative, responders, care agencies or government agencies or any other relevant support provider.

Where relevant, Tunstall may collect government or health identifiers as part of your personal information, these identifiers will not be used as primary identifiers in our systems. Tunstall's telehealthcare and financial systems generate their own unique identifiers for customer records. Tunstall will use the government or health identifiers only for the purpose for which they are collected.

Users have the right to specify people whom they do not wish Tunstall to disclose information to regarding their telehealthcare activities.

3.1.4. Data quality

We maintain and update the personal information we hold as necessary or when we are advised by individuals or their authorised agent that their personal information has changed. Where Tunstall is advised directly by a customer to make a change to their personal information we may be required to advise their authorised agent of the change.

3.1.5. Data security

The personal information collected is held securely in electronic databases. Some personal information may also be held in paper files.

The following Tunstall staff members have access to the electronic databases and paper files on a need to know basis:

- Response Operations Team.
- Clinical Monitoring Team.
- Customer Service Team.
- Finance Staff for the purpose of billing.
- Logistics where applicable for shipping equipment.
- IT staff for provision of technical support.

Some data such as telehealthcare activity data is transmitted to Tunstall databases using secure de-identified protocols and procedures.

When no longer required, personal information in paper files is destroyed in a secure manner, in accordance with Tunstall's Records Disposal Policy and Procedures.

Personal information stored in our electronic databases, when no longer required, is deleted in a secure manner. The databases maintain audit trails whenever personal information is accessed, included, amended or deleted on the database.

3.1.6. Access and correction

For information about how to access or correct personal information held in enquiries files see [2.11 Access and correction](#) of this document.

3.2. Finance Files

3.2.1. Purpose

The purpose of finance files is to store correspondence, transaction information, working papers and other documents that relate to our functions to:

- Pay suppliers.
- Transact with corporate customers and private customers.
- Provide remuneration to Tunstall staff and subcontractors.

3.2.2. Collection

We collect personal information in finance files directly from individuals or their authorised representatives, their support agencies or organisations. This information may have been collected from web forms, emails, over the phone, in writing or paper forms.

3.2.3. Use and disclosure

Personal information in finance files is only used for the purpose of financial transactions on behalf of Tunstall.

Where relevant, Tunstall may collect government identifiers, such as tax file or business numbers, as part of your customer or employee records, these identifiers will not be used as primary identifiers in our systems. Tunstall's telehealthcare and financial systems generate their own unique identifiers for customer and employee records. Tunstall will use the government or health identifiers only for the purpose for which they are collected.

The personal information on policy files is not disclosed to other agencies, organisations or anyone else without consent unless the individual would reasonably expect, or has been told, that information of that kind is usually passed to those agencies, organisations or individuals, or the disclosure is otherwise required or authorised by law.

3.2.4. Data quality

We maintain and update personal information in our finance files as necessary or when we are advised by individuals that their personal information has changed.

3.2.5. Data security

Finance files are stored in either password protected electronic media or in locked cabinets in paper form. When no longer required, personal information in finance files are destroyed in a secure manner or deleted in accordance with Tunstall's Document Destruction Policy and Procedures.

Australian and New Zealand customer financial information is securely held by Tunstall Australasia, in Australia for the purposes of delivering financial transactions for both commercial entities.

The following staff members have access to finance files on a need to know basis:

- Customer Service;
- Sales administration;
- Finance staff.

3.2.6. Access and correction

For information about how to access or correct personal information in policy files see [2.11 Access and correction](#).

3.3. Public Awareness & Education Files

3.3.1. Purpose

The purpose of public awareness and education files is to record details of public awareness and educational activities, such as contact with the media, speeches, event management, surveys and training

The limited personal information in public awareness and education files relates to agencies, organisations, individuals, media representatives, event attendees, service providers and events calendar listings which appear on our website and others with an interest in telehealthcare systems and services.

3.3.2. Collection

It is our usual practice to collect personal information in public awareness and education files directly from individuals.

Sometimes we may collect personal information from an individual's representative or from publicly available sources such as websites, social media or telephone directories. During the course of activities images may also be captured and used with permission from the individuals.

3.3.3. Use and disclosure

We only use the personal information in public awareness and education files for the purposes of undertaking public awareness and education initiatives and managing public relations.

The personal information on public awareness and education files is not disclosed to other agencies, organisations or anyone else without consent unless the individual would reasonably expect, or has been told, that information of that kind is usually passed to those agencies, organisations or individuals, or the disclosure is otherwise required or authorised by law. For example, Tunstall may be required to provide evidence of training of an organisation's staff for their employee records. Images of individuals captured during public awareness activities will only be used with their consent and any time an individual (or their representative) may withdraw consent and request the removal of an image.

3.3.4. Data quality

We maintain and update personal information in our public awareness and education files as necessary, or when we are advised by individuals that their personal information has changed.

3.3.5. Data security

Public awareness and education files are stored in either password protected electronic media or in locked cabinets in paper form. When no longer required, personal information in public awareness and education files is destroyed in a secure manner or deleted in accordance with Tunstall's Document Destruction Policy & Procedures Document.

The following staff members have access to public awareness and education files on a need to know basis:

- Executive,
- Marketing Team,
- Project Management Office,
- Business Development Team,
- Response Operations Team,
- Telehealth Team.

3.3.6. Access and correction

For information about how to access or correct personal information including captured images, in public awareness and education files see [2.11 Access and correction](#) of this document.

3.4. Contacts Lists

3.4.1. Purpose

We maintain contacts lists which include contact information about individuals who may have an interest in Tunstall's products and/or service deliveries and/or involvement in research programs. We use these contacts lists to distribute information about our activities and publications.

3.4.2. Collection

It is our usual practice to collect personal information in contacts lists directly from individuals, for example, where they have asked to be added to a contact list.

Sometimes we collect personal information (except email) from publicly available source such as a website, social media or telephone directory. We usually only collect personal information in this way if the individual would reasonably expect us to, or has given their consent. For instance, we might collect this information if we thought that the individual (or the organisation they work for) would like to receive information about a consultation we are

carrying out, or that they might be likely to consider information about telehealthcare systems and services as useful in the work they do. We would only contact this individual in their work capacity. With regards to email addresses, this information is only collected and used with the express permission of the owner, or when permission can be reasonably implied, for example when the owner has a significant business relationship with Tunstall.

3.4.3. Use and disclosure

We only use personal information in contacts lists for the purpose of managing public and stakeholder relations.

We do not give personal information about an individual to other agencies, organisations or anyone else without consent unless the individual would reasonably expect, or has been told, that information of that kind is usually passed to those agencies, organisations or individuals, or the disclosure is otherwise required or authorised by law.

Tunstall uses a number of online channels, including social networking services, to communicate with individuals and organisations with an interest in health, disability and community care, and occupational health and safety. The use of these services is governed by the online channel's Terms and Conditions and Privacy Policies. Users may be required to supply some personal information such as name and email address to use these channels to communicate with Tunstall Healthcare or our Agencies. Using these services to communicate with us may make some personal information visible to Tunstall and third parties.

Tunstall provides an "Unsubscribe" functionality on its marketing emails and other direct marketing media. Tunstall also maintains a "do not contact" register of basic personal information, unless otherwise requested to delete the personal record, to ensure our marketing and public awareness activities are compliant with Anti-Spam regulations. In the event Tunstall undertakes direct marketing activities to consumers it will compare the contact list against the "Do Not Contact" register of their country of residence and remove any consumers who identified accordingly.

3.4.4. Data quality

We maintain and update personal information in our contacts lists when we are advised by individuals or their authorised agent that their personal information has changed. We also regularly audit contacts lists to check the currency of the contact information. We will remove contact information of individuals who advise us that they no longer wish to be contacted.

3.4.5. Data security

The personal information in the contacts lists is stored in a secure, internally hosted, password protected electronic database. When no longer required, personal information in contacts lists is destroyed in a secure manner or deleted in accordance with Tunstall's Document Destruction Policy and Procedures.

Routine access to contacts lists is limited to the database operators who have responsibility for maintaining the contacts lists. Other staff members have access to the personal information in contacts lists on a need to know basis.

3.4.6. Access and correction

For information about how to access or correct personal information in our contacts lists see **2.11 Access and correction.**

3.5. Administrative Files

Administrative files includes personnel and other corporate services records.

3.5.1. Purpose

The purpose of personnel records is to maintain current employee information for business and employment related purposes, or where authorised or required by law. The personal information in these files relates to the employee and may include:

- Application(s) for employment including the employee's résumé(s), statement(s) addressing the criteria and referee reports:
 - written tasks undertaken by the employee during the selection process,
 - notes from the selection committee during the selection process.
- The employee's employment contract and other records relating to their terms and conditions of employment.
- Details of financial and other personal interests supplied by some employees and their immediate family members for the purpose of managing perceived or potential conflicts of interest.
- Proof of Australian citizenship or residency.
- Certified copies of academic qualifications or technical certifications.
- Records relating to the employee's salary, benefits and leave.
- Medical certificates or health related information supplied by an employee or their medical practitioner.
- Contact details.
- A photographic image.
- Taxation details.
- Police/criminal record checks.
- Working with children checks.
- Superannuation contributions.
- Information relating to the employee's training and development.

The purpose of keeping records on candidates for employment ("applicant files") is to allow us to assess the suitability of candidates for employment at Tunstall, which may include:

- Application(s) for employment including the employee's cover letter(s), résumé(s), statement(s) addressing the criteria and referee reports;
- Written tasks undertaken by the employee during the selection process;
- Notes from the selection panel during the selection process;

- Contact details.

Tunstall may also keep applicant files for future vacancies (eligibility lists) for up to 12 months.

3.5.2. Collection

Tunstall generally collects personal information directly from employees and applicants but may also collect personal information from intermediaries such as recruitment agents and personnel providers.

Tunstall may also collect personal information about employees and applicants from third parties when it is relevant to the selection process.

3.5.3. Use and disclosure

Personal information in personnel files is only used for the purpose of maintaining current employee data and information for business and employment related purposes.

We only use personal information in applicant files for the purpose of assessing and processing applications for employment.

We do not give personal information held in these files to other agencies, organisations or anyone else without consent unless the individual would reasonably expect, or has been told, that information of that kind is usually passed to those agencies, organisations or individuals, or the disclosure is otherwise required or authorised by law.

3.5.4. Data quality

Tunstall will maintain and update personal information in our personnel and applicant files as necessary, or when we are advised by individuals that their personal information has changed.

3.5.5. Data security

Tunstall will ensure that all personnel or application files in its possession or control are protected against loss, unauthorised access, misuse, disclosure or modification and that only authorised employees have access to such material.

Personnel files are stored in locked cabinets in paper form. Previous employee files are archived in boxes and stored in a secure location. Personal information relating to payroll is stored in a locked secure filing cabinet.

A soft copy of applicant files are filed and stored in a secure folder on the Tunstall network.

The following staff members have access to personnel and applicant files on a need to know basis:

- Executive,
- Finance staff,
- Team Managers or supervisors,
- Employees to their own personnel file,
- Human Resources staff.

3.5.6. Access and correction

For information about how to access or correct personal information in administrative files see [2.11 Access and correction](#) of this document.

4. Information collected online by Tunstall

4.1. Collection

It is our usual practice to collect information about all visitors to our online resources. That information is very limited and only used to identify generic behavioural patterns.

Sometimes we use third party platforms to deliver information. These are sites hosted and managed by organisations other than ourselves. Before deciding if you want to contribute to any third party site you should read their privacy policy. If you access information regarding Tunstall via social media such as *Face Book*, *LinkedIn*, *Twitter*, *YouTube* or others, statistical information regarding your activity may be captured. Feedback or interactions captured from Social Media may be used to assist Tunstall in improving the services and products we provide.

There are several methods and packages that we use to collect visitor behaviours on each of our online platforms. We use Google Analytics on our websites. Information and data collected through Google Analytics is stored by Google on servers in various countries. You can opt out of the collection of information via Google Analytics by downloading the [Google Analytics Opt-out browser add on](#).

When you visit any of our online resources, our metric tools may collect the following information about your visit for statistical purposes:

- server address;
- top level domain name (for example .com, .gov, .au, .uk etc.);
- the date and time of your visit to the site;
- the pages you accessed and documents downloaded during your visit;
- the site you visited that linked to our site;
- if you've visited our site before;
- the type of browser you used to access our site.

We record this data to maintain our server and improve our services. We do not use this information to personally identify anyone.

4.1.1. Cookies

Most of our online platforms use session information and cookies. The core functionality on these platforms will be largely unaffected if you disable cookies in your browser but you may be unable to access some advanced functions.

4.1.2. Use and disclosure

We do not give personal information collected online to other agencies, organisations or anyone else without consent unless the individual would reasonably expect, or has been told, that information of that kind is usually passed to those agencies, organisations or individuals, or the disclosure is otherwise required or authorised by law.

4.1.3. Data quality

We will delete or correct any personal information that we hold about you upon your request.

If you are on one of our automated email lists, you may opt out of further contact from us by clicking the 'unsubscribe' link at the bottom of the email, or by emailing marketing@tunstallhealthcare.com.au and requesting to be unsubscribed from any further emails, or mailing lists.

4.1.4. Data security

There are inherent risks in transmitting information across the internet, via email, online forms, or chat service; and we do not have the ability to control the security of information collected and stored on third party platforms. In relation to our own servers, we take all reasonable steps to manage data stored on our servers to ensure data security.

4.1.5. Access and correction

For information about how to access or correct personal information collected on our website see [2.11 Access and correction](#) of this document.

5. Condensed Privacy Policy Australia

5.1. Scope

This Condensed Privacy Policy applies to personal information collected by Tunstall Australasia.

Tunstall has adopted the Layered Privacy Notice format. This document provides you with a succinct overview of how we handle your personal information.

Our complete Privacy Policy can be accessed publically on our website or our intranet for internal use by staff.

5.2. Personal Information Handling Practices

5.2.1. Collection

We usually collect personal information about individuals directly from those individuals or their authorised representative.

We sometimes collect personal information from a third party or from a publicly available source, but only if:

- the individual has consented to such collection or would reasonably expect us to collect their personal information in this way, or

We only collect personal information and captured images for purposes which are directly related to our functions or activities under the Privacy Act 1988 Cth, and only when it is necessary for or directly related to such purposes.

5.2.2. Use and disclosure

We only use personal information for the purposes for which we collected it - purposes which are directly related to one of our functions or activities.

We do not give personal information about an individual to other Government agencies, private sector organisations or anyone else unless one of the following applies:

- the individual has consented
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies
- it is otherwise required or authorised by law
- it will prevent or lessen a serious and imminent threat to somebody's life or health, or
- it is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.
- If we intend to transfer your information outside the Australia/New Zealand Economic Area we will always obtain your consent first.

5.2.3. Data security

We take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure, and against other misuse.

When the personal information that we collect is no longer required, we destroy or delete it in a secure manner, in accordance with Tunstall's Records Disposal Policy and Procedures.

5.2.4. Your choices

You can access the personal information that we hold about you, and you can ask us to correct the personal information we hold about you. For more information, see our complete Privacy Policy – 'access and correction'.

If you are listed on one or more of our media or network email lists you can opt out at any time. You can unsubscribe by clicking on the 'unsubscribe' option in our emails.

5.2.5. Our obligations

Tunstall Healthcare is bound by the Australian Privacy Principles in the Privacy Act 1988, Cth. In addition Tunstall New Zealand is bound by the Australian Privacy Principles in the Privacy Act 1988 when delivering services to Australian customers. For more information see our complete Privacy Policy.

5.2.6. How to contact us

For further information contact us at enquiries 1800 603 377 (07 3637 2200) or alternatively you can write to us at Tunstall Healthcare, Locked Bag 1, Kingsford Smith Drive, Eagle Farm, QLD 4009. Alternatively you can email privacy@tunstallhealthcare.com.au

6. Condensed Privacy Policy New Zealand

We are committed to protecting your privacy. We will only use the information that we collect about you lawfully in accordance with the Privacy Act 1993.

We will not e-mail you in the future unless you have given us your consent and we will give you the chance to refuse any marketing email from us or from another trader in the future.

The type of information we may collect about you includes:

- Your name.
- Address.
- Phone Number.
- Email Address.
- Location Details.

We will never collect sensitive information about you without your explicit consent.

The information we hold will be accurate and up to date. You can check the information that we hold about you by emailing us. If you find any inaccuracies we will delete or correct it promptly.

The personal information which we hold will be held securely in accordance with our internal security policies and the law.

If we intend to transfer your information outside the Australia/New Zealand Economic Area we will always obtain your consent first.

We may use technology to track the patterns of behaviour of visitors to our site. This can include using a "cookie" which would be stored on your browser. You can usually modify your browser to prevent this happening. The information collected in this way can be used to identify you unless you modify your browser settings.

If you have any questions/comments about privacy, you should contact us.

6.1.1. Your choices

You can access the personal information that we hold about you, and you can ask us to correct the personal information we hold about you. For more information, see our complete Privacy Policy – 'Access and correction'.

If you are listed on one or more of our media or network email lists you can opt out at any time. You can unsubscribe by clicking on the 'Unsubscribe' option in our emails.

6.1.2. Our obligations

Tunstall New Zealand is bound by the Privacy Principles in the Privacy Act. For more information see our complete Privacy Policy. In addition, Tunstall Australasia is bound by the Privacy Principles in the Privacy Act, where they are delivering services to New Zealand customers.

6.1.3. How to contact us

For further information contact us at enquiries 0800 488 678 or alternatively you can write to us at Tunstall New Zealand Limited PO Box 13153, Tauranga 3141. Alternatively you can email privacy@tlcare.co.nz.

7. Privacy Statement

The following privacy statement may be applied to forms which are used to collect personal data for the purpose of providing telehealthcare services.

'Tunstall assures you that your confidential personal information will only be used for the purpose for which you have provided it. It will not be provided to any person or agency without your consent or that of your legally designated representative. If you have any further queries or would like a copy of our privacy policy please contact your local Tunstall office or email the Privacy Officer. Personal information collected on service referral forms is required to enable Tunstall to provide a personalised telehealthcare service. You are welcome to contact Tunstall by phone to update your details at any time.'

8. References and related documents

8.1.1. Tunstall Documents

- Password Policy (TS-PO-AP-005-XXX)
- Data Retention Policy (TS-PO-AP-010-XXX)
- Document Control and Records Management Procedure (QM-PR-AP-001-XXX)
- Information Security Policy (TS-PO-AP-003-XXX)
- ICT Data Management Plan (TS-MN-AP-001-XXX)
- Remote Access Policy (TS-PO-AP-006-XXX)
- IT Access Policy (TS-PO-AP-012-XXX)
- Marketing Policy (MK-PO-AU-001-XXX)

8.1.2. External Sources

- Privacy Act (1988) Cth, Australia
- Privacy Act (1993) New Zealand
- Health Identifiers Act (2010) Cth, Australia
- Spam Act (2003) Cth, Australia
- Unsolicited Electronic Messages Act (2007), New Zealand
- ISO/IEC 27001:2005 Information technology – Security techniques – Information security management systems – Requirements
- ISO 9001:2008 Quality management systems – Requirements
- AS ISO 15489 Australian Standard on Records Management