

Quality Compliance and Innovation Pty Ltd Privacy Policy

1 Privacy and Security Policy

Quality Compliance and Innovation Pty Ltd ACN 626 133 873 (**QCI, we, our or us**) is committed to protecting the privacy of your personal information in accordance with the *Privacy Act 1988* (Cth) including the Australian Privacy Principles (**APPs**).

This policy is intended to provide a general overview of our policies for the handling of your personal information. Other policies may apply instead of or in addition to this Privacy Policy in certain circumstances.

By using our website at www.qciconsulting.com.au (**Website**) which includes using our subscription platforms such as the QCI Consumer Experience Survey Tool and/or RIAM Tool (**Software**) and/or providing your personal information to us you consent to us handling your personal information in accordance with this Privacy Policy.

2 Collection of your personal information

We may collect personal information about you in the course of your dealings with us (for example, if you make an enquiry or engage us to provide you with a subscription to our Software) through information you submit via our Website, information you submit via our Software or as part of communications with us.

The type of personal information we collect will depend on your dealings with us. Generally we will collect your name, address, telephone number and email address. We may also collect other personal and sensitive information from you (for example when using our Software we may collect health information about you such as your medical history, and information about the medical treatment provided to you) as well as other information related to your residency at the relevant aged care facility.

We may collect your personal information when you:

- contact us through our Website;
- use any of our online resources including our Software;
- contact us or provide us with personal information directly via any medium including our Website, SMS (Short Message Service), MMS (Multimedia Message Service), IM (Instant Messaging) and email (“Electronic Messages”), social media platforms, mail, telephone and in person;
- interact with our Website; or
- apply for employment with us.

When you use our Website, we may also collect personal information about you in the following general categories:

- We collect information about how you interact with our Website, including the pages you visit, your preferences and settings that you choose. We may do this through the use of cookies and other similar technologies that uniquely identify you.

- If you are a job applicant, we may collect information about the forms you have submitted, any approvals you have given or received, and other similar information related to your job or job application.

We may also collect and log information such as your IP address, access dates and times, browser type and pages visited.

We may also collect personal or anonymous information about you from other sources and may combine that information with other information collected from you or from third parties for the purposes disclosed in this Privacy Policy.

We collect your personal information directly from you, unless it is impracticable or unreasonable to do so. From time to time we may collect personal information about you from third parties (for example, if you are a resident in an aged care facility, the staff of such facility or your medical practitioners may provide us with personal information about you).

If you provide us with personal information about a third party, you represent, and we collect it on the basis that, you have that person's consent for us to collect and handle their personal information in accordance with this Privacy Policy.

We do not intend to collect personal information from any person under the age of 18 years without the consent of a parent or legal guardian. Please do not provide personal information if you are aged under 18 years unless you have the consent of a parent or legal guardian.

If we are unable to collect the personal information we require, or the information provided is incorrect or incomplete, this may affect our ability to provide our services to you.

3 Purposes for which personal information is collected, held, used and disclosed

We will use and disclose your personal information for the purposes for which we collected it, and for other related purposes that you would reasonably expect.

Generally, these purposes include responding to your enquiries, providing you with our services including access to our Software, marketing and promotion, obtaining your feedback and for our general business operations (for example, maintenance of our business records, compliance with our legal and insurance obligations and statistical purposes).

By providing us with your personal information, you consent to us using your personal information for these purposes. You agree that we may send you such information by post or by electronic means (including e-mail and SMS). You can opt-out of marketing and promotional communications at any time using an opt-out mechanism in one of our communications, or by contacting QCI via the details shown below.

We may disclose your personal information to our licensees, agents, contractors and/or promotion partners for the purposes set out above.

Apart from the above instances, we may also use and disclose your personal information with your consent and as otherwise required or permitted by law.

4 Sensitive information

We will only collect 'sensitive information' with your consent. We will assume that you have consented to us collecting all information which is provided to us by you for use in accordance with this Privacy Policy, including any 'sensitive information', unless you tell us otherwise at the time you provide it to us.

5 Storage and security of your personal information

We may hold your personal information in electronic formats or in hard copy. We take reasonable steps to securely store your personal information to ensure it is protected from unauthorised access, modification and disclosure, and from other types of misuse, interference and loss.

We will take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary to comply with any applicable law, for insurance and corporate governance purposes, for the prevention of fraud and to resolve disputes. Your personal information may also be retained in our IT system back-up records.

The transfer of data over the Internet is inherently insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via our Website. Please bear this in mind when transmitting information by this means to us.

6 Access and correction of your personal information

You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading. Please contact us via the contact details shown below.

You may request that we provide you with access to the personal information we hold about you. Generally, we will provide you with access, except in limited circumstances where the APPs permit us to deny access. Any such requests must be made in writing to QCI via the details shown below. Under the APPs we are permitted to charge you a reasonable fee for providing access to your personal information. Please note that no fee will be incurred for requesting access, and if your request for access is accepted we will inform you of the fee (if any) that will be payable for providing access if you proceed with your request.

7 QCI Website

Our Website uses cookies. We do not use the information stored in those cookies to collect information about you or your computer. The cookies are used for statistical purposes and to assist with your use of the Website. We may also collect click-stream data when you use the Website, such as the date and time of your visit, the pages you accessed, your IP address, the type of browser and operating system you are using and the websites you come from and move to. This information is collected for statistical purposes to assist us to find out how our Website is used and navigated and to improve our Website. Other features such as Google Analytics are used in conjunction with our Website. These features collect data via advertising cookies and anonymous identifiers in order to provide ads to users based on certain characteristics. You may opt out of the use of Google Analytics through Google Ads Settings (see www.google.com/settings/ads/plugin).

The QCI Website may contain links to third party websites. QCI is not responsible for the privacy, security or handling of your personal information via those websites. You should review the privacy policy and terms of use for those websites each time you visit them.

8 Overseas disclosure of your personal information

We will not otherwise disclose your personal information to recipients located overseas, except with your consent or where we are otherwise permitted or required to do so by law.

9 Changes to our Privacy Policy

We may amend, modify or replace this Privacy Policy at any time. You should review our Privacy Policy each time you visit our Website or provide us with personal information.

10 Complaints

You may lodge a complaint with us if you believe we have handled your personal information other than in accordance with the APPs. To do so please contact us via the contact details below.

11 Contact us

If you would like further information about the way we manage your personal information or if you have a complaint, please contact QCI by email at privacy@qciconsulting.com.au

We will confirm receipt of your correspondence, and in the case of a complaint, will set out the time frame we require to investigate your complaint and provide you with a response as quickly as possible, which will generally be within 14 days of receiving your complaint.