



HosPortal
CONNECTED HEALTHCARE SOLUTIONS

Privacy Complaints Handling Policy

Version 2

June 2020

HosPortal Privacy Complaints Handling Policy

Purpose

The purpose of the HosPortal Privacy Complaints Handling Policy is to outline procedures for individuals to contact HosPortal regarding complaints in relation to their personal information. This policy is also intended to enable HosPortal to handle privacy complaints in a timely fashion.

Privacy complaints

Complaints that fall under privacy complaints are in relation to the following:

- Collection of personal (including sensitive) information
- Use and/or disclosure of personal information
- Security of personal information
- Refusal to give access to personal information
- Refusal to correct personal information
- Other privacy issues or interference with individual's privacy as covered by the Privacy Act 1988 (Cth) (Privacy Act).

For information about your rights and responsibilities under the Privacy Act can be found by visiting <https://www.oaic.gov.au/privacy-law/rights-and-responsibilities> Any other complaints are handled through our normal process via helpdesk.

Privacy complaints management process

If you need to contact us or have a complaint about your personal information, you should address your communication in writing to the details below:

Privacy Officer

HosPortal Pty Ltd

PO Box 690

Woollahra NSW 1350

Email: webadmin@hosportal.com

If we have a dispute regarding your personal information, we both must first attempt to resolve the issue directly between us.

Preliminary steps

When a complaint is received, we may decide to conduct a preliminary assessment of the complaint. The objective of such an assessment is to determine whether the complaint falls under the Privacy Complaints and should be dealt with according to this policy. We may need to contact you to gather details about the complaint.

We may decide not to deal with a complaint if the complaint is frivolous, vexatious or lacking in substance or is not in good faith.

Investigating the issues raised

If the complaint falls under the Privacy Complaints, we will undertake the investigation. We will consider the following when investigating the issues raised:

- If it appears that the alleged conduct occurred
- Which privacy obligation(s) may be relevant and why
- If it appears that that conduct complied with HosPortal's privacy obligation(s), taking into account any exceptions or exemptions under the Privacy Act or other legislation
- If it appears HosPortal has not complied with our obligations, considering whether the complainant's requests regarding outcomes can be met (for example, an apology, a change in procedures, improvement of security safeguards etc.)

Communicating with the complainant

We will communicate with you directing via call first and then follow up in writing, within 30 days of receiving your complaint. We will provide our response including the following:

- details about the information we have relied on in developing the response
- invitation for you to reply to our response and if appropriate, the offer of a meeting or discussion
- An apology if we did not comply with the relevant privacy obligation(s) in consideration of any additional outcomes that may be appropriate

If you remain dissatisfied with our response you receive, you can contact the Office of Australian Information Commissioner (OAIC). For further information about making privacy complaints through the OAIC can be found by visiting <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

Systemic issues

If the privacy complaints will be resolved by addressing systemic issues, we will remedy them as soon as practicable. These may include:

- Privacy training
- Amendment of policies, forms and/or collection notices
- Providing additional accessible information
- Improve security and storage measures
- Steps to improve data accuracy

We will make a record of any changes we make and evaluate the changes within 12 months as well as against any future privacy complaints.

Finalisation

When finalised, we will store securely the record of the complaint, the investigation and the outcome in accordance with our record keeping requirements.

HosPortal's handling of personal information is an agenda item on the HosPortal weekly meeting and includes report of any privacy complaints against HosPortal and internal data breaches.