

Privacy Policy

Davidson Trahair *Corpsych*

Dated: August 2016

Table of Contents

Privacy Policy	1
1. DTC	4
2. The Purpose of the Privacy Policy	4
Your personal information	5
3. What is personal and sensitive information?	5
4. How we collect your personal information	5
5. Your sensitive information	5
6. What personal information does DTC collect	6
7. Unsolicited information	6
8. How accurate is your personal information	6
9. Protecting your personal information	6
10. Using Government Identifiers	7
11. If you are at risk of harm	8
Use, transfer and sharing of your personal information	9
12. How we use and disclose your personal information	9
13. Your personal information and our related companies	9
14. Marketing our products and services	9
15. When we share your information with other parties	10
16. Transferring personal information overseas	10
Your privacy on the internet	11
17. Collection of other information	11
Cookies	11
Web beacons	11
Links to other websites	11
Dealing with DTC	12
18. Resolving your privacy issues	12
19. Gaining access to and correcting your personal information	12
20. Dealing with us anonymously or under pseudonym	12
21. Contact us	12
APPENDIX 1: DTC typically collects and holds the following information	13

APPENDIX 2: DTC typically discloses to and/or collects from the following entities	14
APPENDIX 3: DTC's list of uses and disclosure of personal information	15

About DTC's Privacy Policy

1. DTC

In this Privacy Policy when we refer to "DTC", "we", "our" or "us", we mean the following companies:

- DTC Australia Pty Limited ABN 70 097 442 281; and
- Davidson Trahaire Corpsych Pty Ltd ABN 61 003 536 472

DTC is part of the Cover-More group of companies, which was acquired by the Zurich Insurance Group in April 2017.

DTC provides a range of health and wellbeing services to organisations. These include Employee Assistance Programs (EAP), Trauma counselling, HR consulting, Health Risk Assessments, and Organisational Development (coaching, training and facilitation).

2. The Purpose of the Privacy Policy

This Privacy Policy ("this Policy") outlines how we manage your personal information. It also describes generally the type of personal information held and for what purposes, and how that information is collected, held, used, disclosed and destroyed or de-identified.

This Policy will be reviewed at least annually, to ensure it remains up to date. It may be amended from time to time by posting the amended version on our website.

Further Information

For further information on privacy in Australia, please visit the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

Your personal information

3. What is personal and sensitive information?

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable, whether or not that information or opinion is true or recorded in material form.

Sensitive information includes health information about an individual, and personal information about an individual's racial or ethnic origin, religious, philosophical or political beliefs, membership of a union or a political, professional or trade association, sexual orientation or practices and criminal record.

Health information includes personal information collected to provide or in providing a health service and personal information about the health or disability of an individual, an individual's expressed wishes about the future provisions of health services to the individual and a health service provided or to be provided to the individual.

DTC regularly collects, holds, uses and discloses health information and is committed to protecting the privacy of this type of information to a higher degree than that of other personal information.

4. How we collect your personal information

DTC collects personal information from and on behalf of clients, customers, business partners, suppliers, employers and third party service providers.

We will, if it is reasonable or practicable to do so, collect your personal information directly from you. This may happen when you fill out an application for one of our products, attend an assessment or participate in a service, become one of our contractors or associates or request assistance. This may occur over the phone, via email, a website, via our chat facility or through one of our agents, contractors or partners.

In certain cases we collect your personal information from third parties. For example, we may need to collect personal information from your representative (such as a legal guardian), your employer or any of the other organisations referred to below under "**Use, transfer and sharing of your personal information**" and identified in **Appendix 2**.

We may also collect information by other means and will take reasonable steps to inform you if and when we do.

5. Your sensitive information

Your health information (including your gender, age range, presenting issue, history of presenting issues, psychosocial background, family history, medical history and lifestyle information), is generally required to arrange assessment of your needs so we are able to provide you with the appropriate level of support and intervention.

Where you provide health information to a third party (e.g. manager, HR representative, medical practitioner, or family member) to pass onto us as part of the support process, we rely on you having provided them with your consent to pass this information to us.

Without your consent we will not collect your sensitive personal information. This is subject to some exceptions including where the collection, use and disclosure of the information:

- is necessary to prevent or lessen a serious threat of harm to life, health or safety
- is required by law

6. What personal information does DTC collect

We will only collect personal information where it is necessary for us to perform one or more of our functions or activities. We collect the personal information we need to provide the services described in section 1 above. In addition, in accordance with our contractual obligations to your employer, we also collect your personal information to enable the provision of confidential and de-identified reporting in relation to organisational trends relating to the health and wellbeing services we provide.

The type of information DTC collects and holds varies depending on the type of product or service we provide to you. For example, DTC will hold different information about you if you are being provided counselling services after a crisis event than if you are receiving counselling under an Employee Assistance Program or health coaching. This information may include information about a disability or medical condition that you have or health information in general.

If you contact us by telephone, these calls may be recorded for training, quality and business purposes.

For the type of personal and sensitive information DTC generally holds please refer to [Appendix 1](#).

7. Unsolicited information

In the event we receive unsolicited personal information, we will determine whether or not we should retain this information. This will depend on whether it is reasonably necessary for one or more of our functions or activities. If we determine that the personal information is not necessary for one or more of our functions or activities and that we should not retain it, then we will, as soon as practicable, either return it to you or whomever sent it to us, destroy it or otherwise ensure it is de-identified, provided that it is lawful to do so.

Otherwise, we will hold, use and disclose the personal information in accordance with this Privacy Policy.

8. How accurate is your personal information

DTC takes reasonable steps to ensure that the personal information collected, used or disclosed is accurate, relevant, complete and up-to-date.

If you believe your personal information is not accurate, complete or up to date, please contact the DTC customer service team on 1300 360 364.

9. Protecting your personal information

We take reasonable steps to securely store your personal information so that it is protected from unauthorised use, access, modification or disclosure. We store personal information in:

- paper form on DTC premises, document storage facilities and where services are provided by our registered affiliates, on their premises.

- electronic form, on both DTC premises and DTC's data-centres, which are managed by our outsourced IT service providers.

We maintain administrative, technical, and physical safeguards for the protection of personal information. Our security measures include, but are not limited to:

Administrative safeguards:

- Access to your personal data is limited to authorised personnel who have a legitimate need to know based on their job. In the case of third-party contractors who process personal information on our behalf, similar requirements are imposed.
- Only allowing access where the individual seeking access has satisfied our identification requirements, such as a security and identification check on the commencement of a call.
- Confidentiality requirements for our employees, contractors, agents and suppliers.
- Secure Document storage.
- Training and education is provided to all group employees in the handling of personal information.

Technical safeguards:

- Security measures for systems access.
- Antivirus and anti-malware software, and regularly updated virus definitions.
- Third parties who we hire to provide services and have access to personal information agree to implement privacy and security practices that we deem adequate.
- Personal information provided on computer servers is secured in a restricted and controlled network environment.
- When transferring credit card numbers, via payment gateways the data is encrypted.
- Employing firewalls and intrusion detection systems.

Physical safeguards:

- Third-party contractors who process personal data on our behalf agree to provide reasonable physical safeguards.
- Effectively and securely destroying data no longer needed, for example, by shredding or pulping in the case of paper records.
- Our security procedures and policies are audited on a regular basis to ensure they are updated in accordance with current legal requirements and current levels of security technology.

While DTC has security measures in place to protect your data, no data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, DTC cannot warrant or ensure the security of any information you transmit to us or we transmit on your behalf, or to you, in the course of providing services over the internet.

10. Using Government Identifiers

DTC does not adopt any government identifiers.

11. If you are at risk of harm

If you are contacting us or receiving assistance from us and you or someone else are at possible risk of harm, DTC have an obligation to intervene and provide the appropriate level of escalation. This may take the form of liaising with a third party (e.g. medical practitioner, family member, manager or work colleague) or in certain situations contacting emergency services.

Use, transfer and sharing of your personal information

12. How we use and disclose your personal information

We use your personal information to provide you with the relevant product or service you have requested.

When disclosing information to your employer, DTC only provides information in the following scenarios:

- In accordance with Section 11 above;
- If you have provided consent;
- If we provide musculoskeletal assessments and high-risk intervention programs for your employer and you have undergone such an assessment which has determined that you are in a high risk category of musculoskeletal restrictions and are therefore eligible to participate in the high risk intervention program (in which case we will advise your employer of your eligibility for the program and your movement limitations); or
- In de-identified reporting as described in Section 6 above.

If you are a representative of one of our corporate customers, we may use your personal information (which is not also sensitive information) to send you material about other DTC products or services as described below in Section 14 (**Marketing our products and services**).

We may also use or disclose your personal information for another purpose for which you may reasonably expect it to be used or disclosed by us and that secondary purpose is related or (if sensitive information) directly related to the purpose for which it was collected.

Otherwise we will only use your information for a secondary purpose if you have consented to this use or disclosure, the use of disclosure is required by law or an enforcement body or to provide assistance in a medical emergency.

For a list of the types of uses of your personal information by DTC please refer to **Appendix 3**.

13. Your personal information and our related companies

When providing our health and wellbeing services, we may refer to information provided by our third party medical and non-medical assistance providers, who include related entities.

14. Marketing our products and services

If you are a representative of one of our corporate customers, we may from time to time, provide you with information about other products, services and offers.

If you do not wish to receive this information, or wish to know the source of the information, please contact the DTC customer service team on 1300 360 364. You can change your mind about receiving information about our products and services at any time, by contacting us or using the opt-out process on our offers or promotional communication.

If you are an individual whose employer has acquired health and wellbeing services from us for you to use and you have contacted us to utilise those services, we may need to contact you in

relation to those services (for example in relation to an appointment you have scheduled) and/or services that your employer wishes you to be made aware of. We will not contact you for marketing purposes.

If you are an individual whose employer has acquired EAP services from us for you to use and you have contacted us to utilise those services, we may need to contact you in relation to those services (for example in relation to an appointment you have scheduled or your counselling records). We will not contact you for marketing purposes.

15. When we share your information with other parties

We will only share (disclose) your personal information with third parties if it is required to fulfil service or product obligations to you, or if it is required under law or in an emergency situation.

DTC will not disclose any personal information that we have collected from you (other than to the parties involved in providing our services to you), except in the situations set out below:

- In accordance with Section 11 above;
- If you, your parent or guardian, power of attorney or executor (as relevant) have provided informed consent; or
- In de-identified reporting as described in Section 6 above.

For a list of the types of entities DTC generally discloses your personal information to please refer to [Appendix 2](#).

16. Transferring personal information overseas

If you are at any time located outside of Australia, you consent to us sending your information to overseas parties if required to provide you with our health and wellbeing services. We may also need to disclose information to third parties who are located overseas when using your information for the purposes set out in Sections 12-15 above. Who those third parties are and where they are located may change from time to time. You can contact us for details.

While we are committed to protecting your information from misuse, loss or interference, when your personal information is sent overseas in some cases we may not be able to take reasonable steps to ensure that those third parties do not breach Australian privacy laws and the information may not be subject to the same level of protection that is offered under Australian privacy laws. You may not be able to seek redress under laws in the overseas jurisdiction in the event of any misuse, loss or interference with your personal information.

By proceeding to acquire or use our products or services you consent to the use or disclosure of your personal information by or to third parties overseas as described in this section.

Your privacy on the internet

17. Collection of other information

DTC may also collect non-personally identifiable information such as the type of browser, or operating system you use, your domain name, IP address, access times, referring website addresses and page views. Our Internet Service Provider (“ISP”) automatically identifies your computer by its IP address. When you visit pages on our website, our ISP may log your IP address. We do not link IP addresses to any personally identifiable information. Your IP address is used to gather broad demographic information only. A User Transaction ID is created each time you enter our website. This ID is used to keep track of your dealings with us, and other requests.

Cookies

DTC does not use cookies to collect information which can personally identify you.

A cookie is a small, text-based file used frequently on some websites and portals. They are designed to assist and streamline the exchange of information between your computer's browser and our computer systems. Other cookies used by DTC collect information about the use of our websites. The information collected includes where visitors connect from, what version of browser they use and their path through the site. It helps us to provide personalised features and keep our content fresh and relevant.

If you do not want information collected through the use of cookies, you can configure your cookie preferences and options through your browser.

Web beacons

Our web pages may contain electronic images, known as web beacons or spotlight tags. These enable us to count users who have visited certain pages of our website. Web beacons and spotlight tags are not used by us to access your Personal Information, they are simply a tool we use to analyse which web pages customers view, in an aggregate number.

Links to other websites

Our web sites may contain links to non-Group web sites. Whilst such links are provided for your convenience, you should be aware that the information handling practices of the linked web sites might not be the same as ours.

Dealing with DTC

18. Resolving your privacy issues

Please contact us if you have concerns about the way in which we have handled your personal information or would like to discuss any issues about our Privacy Policy. You are always welcome to speak directly to our staff and they will do their best to resolve your issue. We also have a complaints process including external dispute resolution and a nominated Privacy Officer who can be contacted as detailed in the [Contacting Us](#) section.

19. Gaining access to and correcting your personal information

You can request access to your personal information. If charges are applicable for providing access we will disclose these charges to you prior to providing you with the information. In limited circumstances, a request for access may be denied, or restricted access given. We will provide reasons in writing for the denial of or limitation on access.

To arrange access please contact us (see the [Contacting Us](#) section). In some cases we may be able to deal with your request over the telephone.

We will correct personal information if we discover, or you are able to show that the information is incorrect. If you seek correction and DTC disagrees that the information is incorrect, we will provide you with our reasons for taking that view and advise you on the further steps you may take.

20. Dealing with us anonymously or under pseudonym

You can deal with us anonymously or you may use a pseudonym where it is lawful and practicable to do so. For example, you may inquire about our products or receive generic information about how we may be able to provide support services to you. However we regret that we will not be able to offer any of our products or services if we cannot identify you.

21. Contact us

DTC Australia Pty Limited

Customer service

Private Bag 913, North Sydney, NSW 2059

email: eapcentre@davcorp.com

Phone: 1300 360 364

The Privacy Officer

Private Bag 913, North Sydney, NSW 2059

email: privacyofficer@davcorp.com

Phone: 1300 131 746

APPENDIX 1: DTC typically collects and holds the following information

- Name and address
- Date of birth
- Contact details, which may include your telephone number and email address
- Your gender
- Emergency contact details
- Your employer
- Information about your personal history (which sometimes may include medical history) and the personal history of any other person you disclose to us in the course of us providing our service to you
- The type of medical and non-medical assistance you have been provided with either by us, our service providers or your own medical practitioner
- Health information you provide to us or is generated as part of your participation in one of our programs
- Background and security checks (for contractor, associates, representatives and suppliers only)
- Other information required to administer the product or services you have requested.

APPENDIX 2: DTC typically discloses to and/or collects from the following entities

Below are the types of entities DTC may collect your personal information from and may disclose your personal information to. This is not an exhaustive list.

- Medical practitioners and specialists
- Medical providers such as hospitals
- Emergency assistance providers
- Family members in the event of a medical emergency
- Record management and storage businesses
- Companies who we engage to collect data, perform statistical analysis, and generate health and wellbeing related reporting to support the services we provide to you.
- Accreditation or certification organisations
- Our professional advisors including lawyers, accountants, tax advisors and auditors
- Debt collection agencies and other parties that assist with debt-recovery functions
- Police and law enforcement bodies to assist in their functions
- Courts of Law or as otherwise required or authorised by law
- Regulatory or government bodies for the purposes of resolving customer complaints or disputes both internally and externally or to comply with any investigation by one of those bodies
- Credit providers or credit reporting agencies (if you are our supplier)
- Printing, mail and distribution companies
- Third party service providers engaged as our agent to provide specialised health and wellbeing services (including flu vaccinations and executive health checks)
- Your employer. (Collecting personal information from an employer could occur if your employer refers you to us for:
 - trauma counselling* or mediation;
 - a health risk assessment, vaccination, musculoskeletal assessment, high-risk intervention program or other services relating to physical health, in respect of which information is usually provided back to employers on a de-identified basis.

In these cases we would need to obtain your consent before we disclose any further personal information to your employer. In the case of services relating to physical health, we may seek your consent prior to providing the service.)

*This does not refer to EAP counselling, which is generally self-referred. EAP counselling is provided on a confidential basis in accordance with the professional codes of ethics to which we are required to adhere.

APPENDIX 3: DTC's list of uses and disclosure of personal information

We use and in some instances disclose your personal information when we, or third parties appointed by us, provide the following services:

- To identify you
- Arranging and managing the support services we provide to you
- To assess an application for a product, including assessing any existing medical conditions
- Evaluating emergency care
- Providing medical and non-medical assistance,
- Dealing with enquiries or complaints
- To monitor and improve the services provided by us and our agents or service providers, the products we provide or our operations
- For planning, product development and research purposes and to seek feedback on products and services (including those products and services offered by others on our behalf)
- Carrying out market analysis and research and product analysis and development
- Enhancing our services for our website visitors
- Conducting internal investigations in relation to crime and fraud prevention, detection or prosecution
- Training our staff
- Providing de-identified health information as well as identifiable health information to employers who have purchased health risk assessments, vaccinations, musculoskeletal assessments, high-risk intervention program services and other services relating to physical health. We would seek your consent before we disclose any further personal information to your employer or, in some cases, prior to providing the service.
- Providing to your employer details relating to your participation in some services we provide (eg trauma counselling,* mediation, seminars, education sessions), where your prior consent has been obtained.
- To identify and develop products or services that may interest you and market them to you (unless you ask us not to do so)
- Carrying out accreditation or certification activities
- Carrying out credit checks, credit reporting and compliance checks through ASIC on our contractors and suppliers
- Carrying out debt-recovery functions
- For any other purposes that would be reasonably expected.

*This does not refer to EAP counselling, which is usually self-referred. EAP counselling is provided on a confidential basis in accordance with the professional codes of ethics to which we are required to adhere.