



Privacy Policy Quantum Health Outcomes

December 2017

Privacy Policy

Quantium Health Pty Limited trading as Quantum Health Outcomes (**Quantium Health Outcomes, QHO, we, us**) is a joint venture between The Quantum Group Pty Limited (**Quantium**) and a South African wellness company, Discovery Limited (**Discovery**).

Quantium Health Outcomes provides data analytics and insights, and strategy consulting services, with a key objective to improve health outcomes for patients and the efficiency of health systems. The nature of our business, the type of work we do, our business partners and the types of clients we work for are outlined on our website www.gho.com.au

1. Purpose of this Policy

We hold data on behalf of our business partners and clients, and we manage it with the utmost security, care and respect.

Where we handle and use personal information, we are committed to managing it in compliance with the Privacy Act 1988 (Cth) (**Privacy Act**) including the Australian Privacy Principles and other Australian privacy and data protection laws (together, **Privacy Laws**).

The purpose of this Privacy Policy is to describe in plain words how we comply with Privacy Laws and demonstrate our commitment to taking all reasonable measures to protect an individual's privacy.

2. What is personal information, sensitive information and health information?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Sensitive information is a subset of personal information and includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional association, trade association or a trade union, sexual preferences / practices, criminal record, and certain health and genetic information about an individual.

Health information is a subset of personal information and sensitive information. Health information includes both personal and sensitive information and may be information:

- a. about the health of an individual at any time;
- b. about an individual's wishes about the provision of future health services to them;
- c. about health services provided (or to be provided) to an individual;
- d. collected to provide a health service to an individual; or
- e. collected in connected with donating body parts, organs or substances.

Health information also includes genetic information in a form that could predict the health of an individual or their relative, even if it is not personal information.

3. What information does Quantum Health Outcomes collect and why?

We generally do not collect or receive personal information, sensitive information or health information for conducting our data analytics, insights or strategy consulting work. Generally, we work with de-identified data, enabling us to understand the trends in the needs and behaviours of different groups of Australians. We receive this de-identified data from strategic partners, clients, data providers (for example, the Australian Bureau of Statistics and Australian Institute of Health and Welfare) and market research companies. Such data includes health service utilisation, health care claims information, health behaviours, prescription information, clinical hospital data, outcomes of clinical treatments as well as attributes like demographic information and purchasing behaviour information. This data is anonymised to a high standard (such that individuals are not identified or reasonably identifiable) and for that reason does not constitute personal information regulated by Privacy Laws. However, in our handling of anonymised data we also maintain strict standards with regard to security and ongoing data protection.

In some circumstances, we may receive personal information (occasionally including sensitive information) from our clients, primarily for the purposes of providing consulting services to help our clients better understand their patients, customers and stakeholders and to ensure that patient care is maximised. This information will (to the extent that this is within Quantum Health Outcomes' control as recipient) only be received by us where necessary for the delivery of such services to our clients and is not shared with third parties.

Quantum Health Outcomes otherwise collects personal information when it is reasonably necessary for one or more of our functions and activities, as follows:

- a. we collect, store and use personal information for recruitment, employment, business, operational and administration purposes. When an individual applies for or accepts a job with us, we may additionally collect sensitive information; and
- b. we collect, store and use personal information for the purposes of maintaining contact with our clients, to keep our clients informed of our products and services, to keep our clients updated on industry developments that may be of interest to them, to keep our clients updated on seminars and other events we are holding, or to otherwise undertake business to business direct marketing activities;

Quantum Health Outcomes uses personal information for the purposes of managing our own staff and to enable us to contact and manage our relationships with our clients.

When we do receive, access, or use personal information, we adhere to all relevant laws and best practice ethical standards.

4. The types of personal information we collect and receive

The types of personal information collected, received, stored and used by us will depend on the functions and activities that are relevant for the collection as outlined below:

- a. where we are collecting information for recruitment, employment, business, operational and administration purposes, the information we collect may include an individual's photo, name, birth date, home address, e-mail addresses, contact details, tax file number, financial information (such as bank account details) and an individual's criminal record;
- b. where we are collecting information for the purposes of maintaining contact with our clients, to keep our clients informed of our services, to keep our clients updated on industry developments that may be of interest to them, to keep our clients updated on seminars and other events we are holding or otherwise to undertake business to business direct marketing activities, the information we collect may include photos, individual's names, job titles, e-mail addresses and contact details; and

- c. Where we are receiving information for the purposes of providing services to our clients, the information we receive will depend on the information provided by our client and the purpose for which it is needed. Such information may include names, postcodes, addresses, dates of birth, email addresses, membership numbers, health behaviours, health outcomes and other information directly related to our clients' products and services being offered to our clients' customers. To the extent that we receive from our clients any personal information (including where any information or data we receive from our clients is capable of re-identification of an individual), and we do not require this information to deliver our software, products or services to that client, we will notify the client and delete such information in accordance with section 13 of this Policy and Australian Privacy Principle 4.

5. How we collect personal information – from an individual directly

Any personal information collected by us is collected in the course of business, by lawful and fair means and in accordance with this policy.

Where we are collecting information for employment, recruitment, business, operational and administration purposes, this information is generally provided by an individual by filling in forms, resumes, face to face meetings, email messages and telephone conversations. Subject to an individual's prior written consent, we may collect personal information about that individual from a third party.

Where we are collecting information for the purposes of maintaining contact with our clients, or to undertake business-to-business direct marketing activities, the information we collect is generally provided by an individual by filling in forms, face to face meetings, email messages, business card, email signatures and telephone conversations.

For the avoidance of doubt, Quantum Health Outcomes does not solicit any personal information from an individual for the purposes of providing data analytics and insights or strategy consulting work.

Where we collect personal including sensitive information directly from an individual, before collecting such information, we will, where practical and reasonable in the circumstances, notify that individual of:

- a. our contact details;
- b. the circumstances and the purpose of the collection;
- c. the main consequence (if any) if all or some of the information is not collected by us; and
- d. any third parties that we may disclose that information to (if any).

6. How we collect personal information – from a third party

Where we receive information for the purposes of providing services to a particular client, we generally receive this information from that client and not the individual directly to which the personal information relates. These clients may include insurance companies, medical service providers, government agencies and others.

We do place reliance on the client to have obtained the relevant individual's consent to disclose the personal information. However, we also have in place robust practices and procedures to satisfy ourselves that such consents have been correctly and properly obtained by our clients. This may include obtaining and reviewing our clients' privacy policies, making reasonable enquiries with our clients about their permitted use of personal information they hold on individuals, and obtaining contractual promises from our client that we are using the personal information in a manner that is consistent with an individual's consent.

Where the information is received from a third party for employment, recruitment, business, operational and administration purposes, we may obtain an individual's consent to collect their personal information from third parties.

7. Use and disclosure of information by us

We only use personal information for the purpose for which it was given to us. We will only use personal information if it is reasonably necessary for one or more of our functions and activities. Such uses primarily include:

- a. for recruitment, employment, business operations and administration;
- b. to maintain contact with our clients, to keep our clients informed of our products and services, to keep our clients updated on industry developments, seminars and other events that may be of interest to them and to undertake business to business direct marketing activities; and
- c. to provide, maintain, improve or develop the services we offer to our clients, which include planning, research and statistical analysis. In this instance, we will only disclose personal information to the client that provided it. For the avoidance of doubt, information provided by our client to enable the delivery of services will only be used for that purpose and will not be used by QHO for any other purpose without the prior written consent of the client.

From time to time, we disclose personal information to Quantum and its related bodies corporate, and Discovery and its related bodies corporate for these purposes.

We will not use any personal information of an individual for a secondary purpose unless:

- d. an individual would reasonably expect that we would use or disclose the personal information for that secondary purpose and that purpose is related to the primary purposes for which it was given to us. For example, we may use personal information, received from our clients primarily for the purposes of providing services, for the purposes of professional indemnity insurance;
- e. that individual has consented to the use of that personal information for the secondary purpose; or
- f. the secondary use or purpose is required or permitted under law.

8. Direct marketing – keeping in touch with our business partners and client

Where we use personal information for the purposes of business-to-business direct marketing, we rely on the exception in the Privacy Act to do so.

We will comply with Australian Privacy Principle 7 and the Spam Act 2003 (Cth) in relation to any direct marketing by us, including:

- a. allowing an individual to opt out of receiving any further direct marketing from us; and
- b. in each written communication from us, setting out our business address, telephone number and, if the communication with that individual is made by electronic means, a number or address at which we can be directly contacted electronically.

9. Quality of information

Where we collect personal information from an individual directly, we take steps to ensure that the personal information we collect, use and disclose is accurate, up to date and complete. These steps include maintaining and updating any personal information when we are advised by an individual that their information has changed.

Where we collect personal information about an individual from a third party, we rely on that third party to ensure that information it collects is accurate, up to date and complete.

10. Security of personal information

We place a high degree of importance on data security and take all reasonable steps to protect any personal information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure. These steps include:

- a. storage of such information in a secure environment;
- b. restricted access to such information to only those for whom such access is reasonable and necessary, including password protection and restricted physical access;
- c. the use of up to date hardware and software security measures; and
- d. establishing processes and procedures to ensure that we review any protections we have in place and ensure that these are operating correctly.

11. Retention of information

We retain personal information after we have used the personal information for the purposes for which we collected or received it. If we retain such information, it will only be used for the following purposes:

- a. as required by or under Australian law, or a court / tribunal order;
- b. as required for professional indemnity insurance; and
- c. in accordance with our back-up archive policy.

When no longer required, Quantum will take reasonable steps to ensure that all such information is de-identified or destroyed in a secure manner and in a reasonable time frame.

12. Access to information

An individual may request access to their personal information held by us, see contact details in section 17 below. Subject to any permitted exception under the Privacy Act, we shall give that individual access to that information. If an individual notifies us that the information we hold about them is not accurate, we will take reasonable steps to correct that information. To the extent that we have received any personal information from a client, we will notify our client that it has received a request from an individual to access or correct the personal information it has provided to us.

13. Unsolicited information received by us

Where we receive any personal information which we did not request or otherwise in error, we shall, as soon as practical, destroy that information or ensure that the information is de-identified. Our employees are given training to ensure that they are able to identify personal information received by us in error.

14. Cookies and anonymous identifiers

A cookie is a small file containing information specific to a user, passed through an internet protocol such as a web browser and stored on a device.

We use cookies, web beacons and other similar technology to track access to, and use of, our website. The information gathered is not personally identifiable and is used to improve our website. If you wish to opt of

receiving any targeted advertising from clients, strategic partners or advertisers, you may do so at www.quantium.com.au/opt-out/

15. An individual's right to anonymity and pseudonymity

Nothing in this Privacy Policy restricts an individual's option to not identify themselves or use a pseudonym when dealing with us, provided that this right does not apply in relation to matters where:

- a. we are required or authorised by or under law, or court / tribunal order, to deal with an individual who has identified himself / herself; or
- b. it is impractical for us to deal with an individual who has not identified themselves or who has used a pseudonym (in a job application for example).

16. Cross-border disclosure of information

Quantium Health Outcomes has an affiliated business in South Africa.

We may be required by a client to disclose personal information about an individual to an overseas recipient, generally a related body of that client, for the purposes of delivering our services. We will ensure that such information is only transferred as follows:

- a. in accordance with any applicable laws;
- b. with the approval of our client; and
- c. the information being transferred is transferred to countries that have an adequate level of protection for the rights of the data subject.

17. How to contact us

If an individual:

- a. would like to access or inquire about any personal information we hold about that individual;
- b. has a query in relation to this Privacy Policy; or
- c. would like to make a complaint about our handling of an individual's personal information, please contact us using the details overleaf.

This Policy relates to Quantium Health Pty Limited (ACN 614 088 363) trading as Quantium Health Outcomes, and any of its related bodies corporate including The Quantum Group Pty Limited.

Contact: Dr Tanya Pelly
The Privacy Officer
privacy@qho.com.au

Address: Quantum Health Pty Limited
(t/a Quantum Health Outcomes)
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