

## PharmacyID Privacy Policy

This Privacy Policy was last updated on 9 February 2023

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## 1. About this Privacy Policy

1.1 PharmacyID Pty Ltd (ABN 20 602 503 775) (**PharmacyID, we, us or our**) has implemented this Privacy Policy to provide information about what kinds of Personal Information we may collect or hold, how we collect, hold, use and disclose that Personal Information, choices you have regarding our use of that Personal Information, and your ability to access or correct that Personal Information. If you wish to make any inquiries regarding this Privacy Policy, you should contact our Privacy Officer in any of the ways specified in paragraph 15.

1.2 From time to time, PharmacyID may be related to other companies and entities (related entities). This Privacy Policy applies to the use of your Personal Information by us and by those related entities. Those related entities may also have their own privacy policies which set out additional detail or differences in their privacy practices. To the extent that those privacy policies are inconsistent with this Privacy Policy, those privacy policies will prevail over this Privacy Policy in relation to the actions of those related entities. A reference in this Privacy Policy to PharmacyID, we, us or our is also a reference to those related entities.

## 2. Personal Information

2.1 "**Personal Information**" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

## 3. Collection of Personal Information

3.1 The types of Personal Information we may collect about an individual will depend upon the nature of our interaction with them. We collect personal information for a variety of purposes including but not limited to National Criminal History Checks, and for the Department of Home Affairs, Document Verification Service (DVS), and we may in future provide services in respect of the TDIF Framework as outlined on the Digital Transformation Agency web-site <https://www.dta.gov.au/>.

3.2 Examples of Personal Information we collect include:

- Full name and other names you have ever been known by
- Date of Birth
- Gender
- Current address and residential history for the past five years
- Sensitive Information, which may include the result of DVS checks and criminal history information and biometric information such as personal photographs
- Demographic Information
- Email address and mobile phone number

- Copies of identification documents such as passport, drivers licence, birth certificate, Medicare card and other Australian government issued documents as well as documents issued by governments other than Australia, such documents may also include document numbers
- Information collected from credit reports only upon request by PharmacyID clients
- Financial information including your ABN or ACN, assets and liabilities, investment and loan accounts, insurance application details, consumer spending
- Property ownership
- Rental references and prior rental contacts
- Payment details, such as your credit card or bank account details
- Reason for obtaining the relevant check
- Information or opinion relating to the applicant's current or previous application process
- For police checks we will have information relating to whether a person has a criminal conviction or not. If a person does have Disclosable Court Outcomes (DCO'S) this information may be shared with their employer or prospective employer, with the consent of the employee or prospective employee
- DCO'S reported to PharmacyID via the ACIC will be automatically purged from the PharmacyID system at the expiration of 90 days, in accordance with the ACIC guidelines. Information regarding these DCO'S will no longer be available to the employer or the employee after this time. PharmacyID and PharmacyID staff will also be unable to view DCO'S after the expiration of 90 days.

3.3 **"You"**, depending on the context, means, applicants who are providing information to be checked as requested by one of our clients, such as the applicant's employer or potential employer, service provider, pharmacist and client:

(a) When you directly make an account and fill out an application form in respect of a National Criminal History Check as outlined by paragraph 4.3 or are having your identity verified via DVS, you are considered an applicant.

(b) If you provide PharmacyID with any third party service, such as providing Personal Information upon request to PharmacyID about an applicant for the purposes of assisting us to fulfil a verification check.

(c) You are a pharmacist if you are officially part of the PharmacyID network as a pharmacist who assists us to deliver our services at the Pharmacy you operate out of.

(d) You are a client if you utilise PharmacyID to conduct verification checks on behalf of your company. For example, you request that a prospective or current employee use PharmacyID to submit a National Criminal History check.

#### **4. How and when do we collect Personal Information?**

4.1 We collect your Personal Information to allow us to conduct our business functions, to provide, market and sell our services and for the specified purposes set out in this paragraph 4 and paragraph 6. In some circumstances the collection of Personal Information may be required by law.

4.2 We may collect your Personal Information in the course of providing you or one of our clients with our services in respect of checks or identity verification to be conducted in respect of an applicant, or:

- (a) when you use or buy our services
- (b) when you provide us, or you offer or apply to supply us, with goods or services
- (c) when you provide information to us in any way (including by completing a form, disclosing information over the phone or via email, or providing us a business card)
- (d) when you request information about us or our services
- (e) when you provide feedback to us
- (f) when you visit or fill in a form on our Website (see paragraph 5)
- (g) when you register for or use an account on our Website
- (h) when you visit premises from which we operate
- (i) when you (or your employer) provide that information to us in the course of conducting or administering our relationship with you, or when you are carrying out activities in connection with our business operations
- (j) when you otherwise contact us by telephone, fax, email, social media, post or in person
- (k) to set up a business/client account with us to facilitate services to our clients in respect of applicants they request checks in relation to
- (l) where we are otherwise required or authorised by law to do so.

4.3 However, one of our main purposes for the collection of your Personal Information includes for National Criminal History Checks.

Information for National Criminal History Checks is collected for the purpose of accessing Nationally Coordinated Criminal History Checks from the Australian Criminal Intelligence Commission (ACIC) and strictly in accordance with the ACIC guidelines.

Information collected for the purpose of a National Criminal History check can only be used for that purpose unless a secondary purpose exemption applies.

It is important that the applicant supplies an adequate purpose for the conduct of the National

Criminal History Check as agencies responsible for administering the disclosure of Disclosable Court Outcomes (DCO), take into account the type, category and purpose that the check is requested for in determining the release of DCO'S.

Data collected from applicants for the purpose of a National Criminal History Check will be retained by PharmacyID for the purpose of audit requirements, quality control and system updates within PharmacyID, although, as detailed previously, DCO'S will be automatically purged from the PharmacyID system at the expiration of 90 days. Clear National Criminal History checks will be purged from the system at the expiration of twelve months.

The collection of data in relation to the obtaining of a National Criminal History Check is collected for the purpose of conducting that National Criminal History Check only and for no other purpose.

If the National Criminal History Check also contains a reference to a Document Verification Service check (DVS check) which is used for the purpose of authenticating Australian Government documents, separate permission will be sought from the applicant before this information is transmitted to DVS, in accordance with DVS requirements and contractual obligations. For example, the applicant must tick a "tick box" in order to provide consent for a DVS check of their identity documents.

4.4 The manner in which PharmacyID collects information required for the conducting of a National Criminal History Check is direct from applicants for that check and from clients who collect the information from the applicant; while the outcomes of the check itself are collected directly from the ACIC.

For example, an applicant for a position with an Aged Care provider may give their information to their employer who in turn will provide that information to PharmacyID. Generally the information is provided to PharmacyID via a direct web link to the PharmacyID portal, where it is stored on the PharmacyID secure server. However on some occasions applicants are incapable of transmitting information via the internet and may need to mail their application and identity documents direct to PharmacyID. Information received in this manner is scanned and secured on the PharmacyID portal in the same manner as information received directly via the PharmacyID portal.

4.5 The other ways in which PharmacyID may collect Personal Information through other services include:

**(a) Manner of Collection of Information for the Document Verification Service (DVS)**

The Document Verification Service (DVS) is a national secure online system, which enables authorised entities to electronically verify Evidence of Identity (EOI) documents issued by a range of Australian, State and Territory government agencies.

The Attorney General's Department (AGD) has overall responsibility for the development and oversight of the DVS.

Evidence of Identity (EOI) documents that can be checked by the DVS are produced by a

number of different Australian, State and Territory government agencies. These agencies are known as DVS Issuer Agencies.

Authorised government agencies and some private sector organisations (required under Commonwealth law to identify their customers) may use the DVS to verify relevant EOI documents. PharmacyID is a Gateway Service Provider (GSP) for the DVS.

In order to use the PharmacyID GSP, a user will submit information relating to Australian Government issued documents and the DVS will co-ordinate the check with the DVS Issuer Agencies to verify that the document produced is an authentic Australian government issued document. Examples of these documents include passport, Medicare card, birth certificates, and driver's licences.

The DVS may be used to assist in verifying a person's identity for reasons including a National Criminal History Check, opening a bank account, opening a telephone account.

More information regarding the DVS can be found here: <https://www.idmatch.gov.au/>

4.6 Generally, when providing our products and services, dealing with our personnel, or obtaining goods and services from our service providers, suppliers or contractors, we collect Personal Information directly from the relevant individual where reasonable and practicable.

4.7 We may also collect Personal Information about you from third parties and other sources as outlined above as well as:

- (a) publicly available sources of information
- (b) related entities, companies and businesses of PharmacyID, and
- (c) credit reporting bodies.

but we will only collect your Personal Information in this way if it is unreasonable or impractical to collect this information directly from you or if we are otherwise permitted to do so.

4.8 If the Personal Information we collect includes sensitive information, including health information and biometric information, we will ask for your consent to collect sensitive information, unless the law allows us to collect it without your consent.

4.9 Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

4.10 If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, or if we do not or are unable to collect the Personal Information we require, we may not be able to provide you with our services, or to effectively conduct our relationship with you.

## **5. Information collected via our Website**

5.1 Personal Information may be collected by us and by our third party service providers who assist us in operating our website at <https://pharmacyid.com.au>, including its subdomains and any

other website we operate from time to time (collectively the **Website**).

5.2 We may use various technological methods from time to time to track the visiting patterns of individuals accessing our Website, including but not limited to the methods set out in this paragraph 5.

### **Google Analytics**

5.3 We use Google Analytics to collect information about how people use our websites. The information we obtain from Google Analytics helps us understand user needs so that we can offer a better user- experience.

5.4 Google Analytics uses cookies to collect information about which pages you visit, how long you are on the site, how you got there (for example from a search engine, a link, an advertisement etc.) and what you select. Information collected by the cookies (including your IP address) is transmitted to and stored by Google on servers in the United States.

5.5 By using this website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

5.6 If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

### **Web Beacons**

5.7 Web beacons are images that originate from a third party site to track visitor activities. We use web beacons to track the visiting patterns of individuals accessing our Website.

## **6. How do we use your Personal Information?**

6.1 We use the Personal Information we collect about you for our business functions and activities, in order to operate our business efficiently. If you are an applicant in relation to a National Criminal History Check, DVS or TDIF services, we collect your Personal Information for the purposes set out above in the Privacy Policy.

6.2 We may otherwise collect, hold and use your personal information to/for:

- (a) identify and communicate with you
- (b) enable us to provide you with requested information, or services
- (c) otherwise assist customers by providing them with information and support
- (d) help us to manage and enhance services we provide to you
- (e) facilitate payment for our services
- (f) help us to manage and enhance services we procure from our suppliers and subcontractors
- (g) personalise and customise your experiences on our Website



- (h) manage and administer any account you may hold with us
- (i) carry out credit checks
- (j) protect you and us from fraud
- (k) help us manage our business operations
- (l) business support purposes including maintenance, backup and audit
- (m) respond to any queries or complaints you may have
- (n) investigate, review, mitigate risks associated with, and inform you of, a data or other security breach involving your personal information, or
- (o) comply with our statutory and legal obligations.

6.3 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of the Website or to retain the content of any user session.

6.4 You consent to us using your Personal Information in the above ways and as set out in this Privacy Policy.

6.5 We otherwise do not share information about you with government or other commercial entities without your consent unless it:

- (a) is necessary to provide you with a service that you have requested
- (b) is in accordance with this Privacy Policy or any agreement you enter into with us
- (c) is required or authorised by law, including without limitation the Australian Privacy Principles under the Privacy Act 1988 (Cth).

## **7. When do we disclose your Personal Information?**

7.1 PharmacyID may disclose, or provide access to, your Personal Information to third parties in connection with the purposes described in paragraphs 4 and 6. Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to our related entities, to third parties that provide services to us or through us.

7.2 We may also disclose your Personal Information to:

- (a) any of PharmacyID's internal divisions, business units or departments
- (b) your nominated representatives
- (c) other organisations or individuals who assist us in providing products and services to you
- (d) professional service providers and advisors who perform functions on our behalf, such as lawyers
- (e) representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing services or administering our business (such as for data storage or processing, printing, mailing, marketing, planning and product or service development)

- (f) credit reporting bodies and mercantile reporting agencies
- (g) debt collecting agencies
- (h) other entities who are your credit providers or trade suppliers
- (i) Government, regulatory authorities and other organisations as required or authorised by law such as Services Australia or the Police).

7.3 Information obtained for the purpose of a National Police Check will be disclosed to the Australian Criminal Intelligence Commission (ACIC) and their National Criminal History Checking Service (NPCS).

ACIC and the NPCS will use information provided by you for the purpose of completing a Nationally Coordinated Criminal History Check. ACIC contact information is available for their web-site, <https://www.acic.gov.au>.

All police checks conducted via PharmacyID are done so under an Agreement for Controlled Access by Duly Accredited Bodies to Nationally Coordinated Criminal History Checks.

7.4 We may also disclose your Personal Information to our Website host in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.

7.5 As we continue to develop our business, we may buy, merge or partner with other companies or organisations, and in so doing, acquire customer Personal Information. In such transactions, Personal Information may be among the transferred assets. Similarly, in the event that a portion or substantially all of our business or assets are sold or transferred to a third party, we may also disclose certain information including your Personal Information to a purchaser or potential purchaser in connection with the sale or potential sale of us, our business or any of our assets, including in insolvency.

## **8. Interstate and Overseas disclosures**

8.1 Some of your Personal Information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers. This may happen if:

- (a) our offices or related entities are overseas
- (b) we outsource certain activities overseas such as a credit check
- (c) transactions, information, services or products have an overseas connection, or
- (d) our computer systems including IT servers are located overseas.

8.2 You consent to the collection, use, storage, and processing of your Personal Information outside of Australia as set out in this Privacy Policy.

8.3 In particular, currently PharmacyID have clients in the United Kingdom who conduct National Criminal History Checks on prospective employees. Generally these checks are for teachers who are seeking employment in the UK. Currently, the United Kingdom is the only country that we may seek information from or release information to but this may change over time. All policies regarding the collection, retention, release of information for Australian clients or individuals will also apply to international clients.

8.4 From time to time, we also may use international third parties to conduct police checks which will involve the disclosure of your personal information to the appropriate entities in these locations.

8.5 Any requests for information, complaints or the ability to contact the OAIC directly (<https://www.oaic.gov.au/>) may be done as if the person complaining is resident in Australia. International residents or people located overseas will not suffer any disadvantage by not presently being in Australia.

## **9. Other uses and disclosures**

9.1 We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Policy. If we do so, we will make it known to you at the time we collect or use your Personal Information.

## **10. Marketing**

10.1 You consent to us using your Personal Information (including your name and the contact details you have provided to us separately, but not information we have obtained as a result of conducting a National Criminal History Check or other identity service on an applicant) for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, SMS and MMS messages.

10.2 If you do not want to receive marketing information from us, you can unsubscribe by contacting us using the contact details specified in paragraph 15.

## **11. Storage and Security of Personal Information**

11.1 We aim to keep your Personal Information secure. PharmacyID will hold personal information as either secure physical records, electronically on our intranet system or in our Tier 3 data centre Microsoft Azure which is hosted on the east coast of Australia. Azure complies with ISO27001 for Information Security Management and is recommended by the Australian Signals Directorate.

11.2 PharmacyID:

(a) collects and stores information which is relevant and within the standards prescribed by the organisations that PharmacyID deal with, including the ACIC, the DTA and the DVS.

(b) limits access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. We will only process your Personal Information on our instructions and they are subject to a duty of confidentiality.

(c) have put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

(d) will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

11.3 Data gathered for the purposes of a National Criminal History Check is stored for no less than 12 months, but no more than 15 months, following collection.

## **12. You can access and update your Personal Information**

12.1 You are generally entitled to access Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you full access to your Personal Information. Depending on the nature of the request, PharmacyID may charge for providing access to this information, however such charge will not be excessive. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where we are required by law to give those reasons.

12.2 You can access and correct some of your Personal Information through the Website by logging into your account and updating or editing your profile at any time. Alternatively, a request for access can be made by contacting our Privacy Officer in any of the ways specified in paragraph 15.

12.3 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete.

12.4 Please contact us in any of the ways specified in paragraph 15 if you believe that the Personal Information is inaccurate, incomplete or out of date, and we will use all reasonable efforts to correct the information.

12.5 It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.

12.6 If applicable, all relevant authorities (such as the ACIC, DVS, TDIF), may also be advised of a request that involves information provided to or received from those authorities where relevant.

## **13. How do we deal with complaints about privacy?**

13.1 If you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Policy, please contact our Privacy Officer in any of the ways specified in paragraph 15 and advise us as soon as possible. We will investigate your queries and privacy complaints within a reasonable period of time depending on the complexity of the complaint. If applicable, all relevant authorities (such as the ACIC, DVS, TDIF), may also be advised of a complaint that relates to information provided to or received from those authorities, and of the outcome of our investigation.

13.2 There is a separate Disputes Process for National Criminal History Check results which PharmacyID staff will assist you in completing. Full details are available on the PharmacyID Home Page in a document entitled "Disclosable Court Outcomes and Disputes". Please contact Pharmacy ID on the contact details listed above if you wish to discuss a dispute issue or you would like to be sent a copy of the dispute process document.

13.3 If an individual is not satisfied with the outcome of the PharmacyID investigation, they may take their complaint directly to the Office of the Australian Information Commissioner, <https://www.oaic.gov.au/>. The OAIC may be contacted by telephone on 1300 363 992 or by writing to them at

GPO Box 5218 Sydney NSW 2001.

#### **14. Updates to this Privacy Policy**

14.1 We may, from time to time, review and update this Privacy Policy, including to take into account new laws, regulations, practices and technology. All Personal Information held by us will be governed by our most recent Privacy Policy, posted on our Website at: <https://pharmacyid.com.au/> where the Privacy Policy will be located. Any changes to this Privacy Policy may be advised to you by updating this page on our Website. We will aim to provide reasonable advance notice of such changes though this may not always be possible depending on the circumstances. We encourage you to check this page from time to time for any changes.

#### **15. What to do if you have a question, problem or complaint, or want to contact us about our use of your Personal Information or this Privacy Policy**

15.1 If you:

- (a) have a query or concern about this Privacy Policy or our Personal Information handling processes
- (b) wish to make a complaint in relation to a breach of your privacy
- (c) would like to access your Personal Information held by us, or
- (d) would like to update or correct your Personal Information held by us,

please contact our Privacy Officer in any of the following ways:

- » Email Address: [help@pharmacyID.com.au](mailto:help@pharmacyID.com.au)
- » Mailing Address: PharmacyID, Suite 2B, 80 Keilor Road, Essendon North, VIC 3041
- » Phone: 03 9379 3383