



I.C.E Medical & Training

Privacy Policy

I.C.E Medical & Training Pty Ltd ACN 628 212 000 (I.C.E, We, Our, Us and other similar terms) takes all reasonable steps to implement processes and procedures for the management of Personal Information including Health Information. I.C.E endeavours to comply with the Australian Privacy Principles (**APP's**) as contained in the *Privacy Act 1988*(Cth) (**Act**)(**Law**).

This Privacy Policy applies to all personal information collected by I.C.E in the course of providing services to Our Clients and their employees who consent to receive a vaccination or any Health Service (**Clients, Participants, You, Your and other similar terms**) regardless of the source of that Personal Information. This Privacy Policy is available on our website at <https://www.icemedical.com.au/privacy-policy>.

Terms that are capitalised in this Privacy Policy, take their meaning from our Health Check Service or Vaccination Service Agreements entered into with our Clients or the relevant Consent Form completed by Participants who elect to receive any health services or vaccinations or are otherwise defined herein. This Privacy Policy should also be read in conjunction with these three (3) documents.

1.1 Definitions used in this Privacy Policy

Australian Privacy Principles means the thirteen (13) principles set out in Schedule 1 of the *Privacy Act 1988*(Cth).

Client means a party to Vaccination Service Agreement or Health Check Service Agreement with I.C.E that nominates Participants to receive Health Services.

Consent Form means a document signed by a Participant prior to receiving a Health Service from Us to confirm they freely agree to receive such services and are aware of any potential risks.

Health Check means an examination conducted by a suitably qualified I.C.E Health Service Representative who obtains a variety of Health Information about a Participant's health in prescribed areas as requested by the Client.

Health Information means as defined in s6FA of the *Privacy Act 1988* (Cth). It is information or an opinion of an individual about their health, illness, disability or injury, expressed wishes of future Health Services, genetic information, Personal Information, and Health Services provided or to be provided.

Health Service means any activity that is designed to assess, maintain, improve or manage or diagnose an individual's health.

Online Enquiry means the information submitted through the Website and accessed with the following address: <https://www.icemedical.com.au/contact/>.

Representative means an individual nominated by a Client who is authorised to liaise with Us and enter into an agreement for the provision of Health Services.

Participant means a person nominated by a Client who agrees to receive a Health Service from Us after the completion of the relevant Consent Form.

Personal Information means information or an opinion about an identified individual or an individual who is identifiable whether the information or opinion is true or not and whether it is recorded in a material form or not.

Vaccination Service Agreement means an agreement that the Client enters into with Us to provide Health Services.

Health Check Service Agreement means an agreement that the Client enters into with Us to provide Health Services.

Website means the website with the following address: <https://www.icemedical.com.au>

1.2 Collection of Personal and Health Information

(a) Personal Information collected from Clients

We collect a variety of Personal Information about Representatives nominated by Clients including, but not limited to, their name, address, position or title and information contained in a Vaccination Service Agreement or Health Check Agreement or I.C.E collects other Personal Information via Our website and correspondence via telephone or email.

(b) Health Information collected from Participants

We collect a variety of Health Information about Participants for the purpose of providing a Health Service. We collect this information from Participants via Consent Forms or because they have elected to have a Health Check completed.

1.3 How I.C.E collects and holds Personal and Health Information

I.C.E may collect Personal Information about Clients and potential Clients, Participants and potential Participants via Our Website. We endeavour to collect Personal Information and Health Information about an individual only from that person or an authorised representative. Information We obtain from third parties or publicly available information is limited to circumstances where the person has consented to the collection of such information.

(a) Website

I.C.E collects a variety of information about potential or existing Clients or Participants through their online enquiry which collects information including their nominated contact, company name, phone number and email address.

(b) Consent Forms

I.C.E collects Health Information from Participants who complete a Consent Form. This information is required to be collected and recorded for the purpose of providing a Health Service.

(c) Customer Relationship Management system

We may hold Personal Information about Representatives in our Customer Relationship Management System known as Agile CRM. We do not store Health Information in this system.

1.4 Purpose of collection and use

(a) Personal Information

I.C.E collects, holds, uses and discloses Personal Information to deliver and improve the Health Services We provide to Clients and Participants. Generally, Clients are only obliged to provide Us with information necessary for Us to provide Our services to their Participants.

(b) Health Information

In order for us to provide a Health Service, we must collect and retain certain Health Information from Participants. The information collected is shown on the respective Consent Form which the Participant is required to complete and provide to Us at the time they receive the Service.

We may provide aggregated Health Information to Clients who entered into a Vaccination Service Agreement or Health Check Service Agreement however nothing in a report of that nature will enable the Client to identify an individual Participant who has received a Health Service from Us.

1.5 Collection of information from the Internet

I.C.E collects information from Our Website and from Our interactions and dealings with Clients and potential Clients and from surveys or other tools that are completed or voluntarily provided. This information is all held in a CRM System known as Agile CRM.

Access to Agile CRM is password protected and this system is encrypted. We take reasonable steps are taken to ensure all information provided is secure. We will collect Personal Information by only lawful and fair means. The Law requires Us to collect Personal Information about Client Representatives only from them directly, if it is reasonable and practical to do so.

In the case of Health Information collected via online forms, We use a system known as "Book It Live" <https://www.bookitlive.net> whose servers are located in Australia.

2. Access, correction and complaint procedure

2.1 Accessing Personal Information or Health Information we hold about you.

If You are a Representative who we hold Personal Information on or a Participant that has provided us with Health Information pursuant to the provision of a Health Service and would like to access or correct the information held, please contact:

The Privacy Officer

Ms Lynette Bishop, Director
I.C.E Pty Ltd
ACN 628 212 000
GPO Box 624, Brisbane CBD, QLD, 4001
Telephone: 0419 701 991 or 1300 678 161
Email: manager@icemedical.com.au

You will need to identify yourself to Us to Our reasonable satisfaction before We will provide You with access to Personal or Health Information which We may (or may not) as the case and context requires have in Our possession.

2.2 Complaints procedure

I.C.E is a service orientated business. Therefore, if You have a complaint about Our collection or use of Personal or Health Information pertaining to You, then We ask that You to contact Our **Privacy Officer** at first instance. If after investigating Your query and reporting to You about an alleged breach of the Australian Privacy Principles and reporting the results of Our investigations to You, You are not satisfied then We would ask that You contact:

The Australian Information Privacy Commissioner

GPO Box 5218
Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au
A complaint form can be found at:
<https://forms.business.gov.au/aba/oaic/privacy-complaint/>

2.3 Transfer of personal information outside Australia

Personal Information We collect will be accessed by employees and contractors or service providers that We engage to provide services to I.C.E outside of Australia. Personal Information contained in a record may be stored on servers outside Australia.

We use Gmail as our email provider which may result in Personal Information about a Representative being transferred outside of Australia. We do not transfer Health Information collected from Participants outside of Australia.

We take reasonable steps to ensure that parties that provide Us with necessary services for website hosting and database administration services act in accordance with the Australian Privacy Principles. We also use only recognised service providers who use enterprise level software with up to date SSL Encryption.

2.4 Sensitive information

We do not collect Sensitive Information on Participants unless it is required for the purpose of providing a Health Service.

2.5 How We deal with unsolicited Personal Information

We only collect Personal and Health Information about individuals by lawful and fair means.

2.6 Notice of collection of Personal Information

Where possible, We notify Participants when We are collecting Personal Information about them, the use of which is subject to this Privacy Policy.

Collection Notice

By providing I.C.E with this information, You acknowledge that We are collecting and storing Health Information about You. We do this only for the purpose of providing Health Services to You and in accordance with our Privacy Policy which appears at [www.https://www.icemedical.com.au/privacy-policy](https://www.icemedical.com.au/privacy-policy)

3. Use of Personal Information in Direct Marketing

3.1 Direct marketing

We may use Personal Information for the purposes of promoting Health Services to Representatives of Clients which We would reasonably expect them to expect from us. All Commercial Electronic Messages contain a functional unsubscribe facility as required by the *Spam Act 2003*(Cth).

3.2 Opting out

Client Representatives can unsubscribe to Our marketing material by clicking on the functional unsubscribe facility contained in any email or can contact The Privacy Officer on the details set out above.

3.3 Use of cookies

We do not use Cookies on our Website, however from time to time we may provide Participants with a different kind of cookie after they receive a Health Service.

3.4 Security measures taken for Cross Border disclosure of Personal Information

We take reasonable steps to protect the Personal Information We hold from misuse and loss and from authorised access, modification or disclosure when We send Personal Information offshore. All service providers that are necessary for Us to use for I.C.E to provide service use enterprise level security and undergo review of a computer security consultant.

Further, We take reasonable steps to destroy or permanently de-identify Personal Information if it is no longer needed or used by I.C.E. All paper Consent Forms that are complete by Participants to record Health Information, are destroyed by quality assured document destruction service after electronic copies are kept. Electronic copies are stored on Our Local Servers within Australia.

4. Integrity of Personal Information

4.1 Accuracy

We take reasonable steps to ensure that the Personal Information We collect, use or disclose is accurate, complete and up-to-date.

4.2 Security

I.C.E takes reasonable steps to safeguard the disclosure of Personal and Health Information from third parties, contractors and staff. Contractors involved in the provision of Health Services sign Confidentiality Agreements obliging them to treat information collected from participants confidentially. We have up to date procedures and policies relating to information technology as it relates to staff and strive for best practice in this area.

4.3 Updates to this Privacy Policy

This Privacy Policy may change from time to time. The current version is available on Our Website located at Aggregated, de-identifiable statistical data may be disclosed to employers of staff receiving health services in support of recommendations made to employers regarding workplace health and safety improvements and initiatives.

This document was last updated on **23 September 2018**.