

## Privacy Policy

V1.2a

Last reviewed: July 2021

Here at Healthy Ltd we understand that privacy and how we collect, use, disclose and protect your information is important to you. We are committed to ensuring the privacy of your information and to complying with the Australian Privacy Principles (APPs), which are contained in the Privacy Act 1988 (Privacy Act).

We use the term “personal information” in this Policy to mean information or an opinion (whether true or not) about an identified, or reasonably identifiable, individual.

### 1. WHAT PERSONAL INFORMATION DO WE COLLECT?

The types of personal information which we collect will depend on the nature of your dealings with us. We may collect personal information from you when you:

- have business dealings with us, including as a client, supplier, contractor or advisor (or a potential client, supplier, contractor or advisor);
- register for a website or app hosted or developed by us, including a website or app we have developed behalf of a third party or client; or
- apply or register your interest for employment with us.

The personal information we will collect from you will usually include your name, title, address and e-mail address and contact numbers (telephone, mobile). If necessary for the purposes of providing services to you or for providing you with other information relating to our business, we may collect other personal information from you. However, we do not collect personal information that we do not need.

While we seek to minimise the personal information we collect, if you do not provide us with the personal information we request, we may not be able to provide you with the services and other assistance you seek.

Generally, we endeavour to collect personal information directly from the individuals concerned. However, if this is not practicable, we may collect personal information about individuals from third parties, including from publicly available sources. If we do, we will take reasonable steps to ensure that the individuals concerned are made aware of the collection of their information.

If you are a business contact (e.g. a contact person in one of our suppliers, or in a government agency or company with which we deal), we may collect standard information from you (e.g. your name, title and work contact details). We will not ask to collect sensitive information about you (such as details of your racial or ethnic origin, political affiliation, religious beliefs, sexual preferences, criminal convictions or health information).

### 2. HOW DO WE USE PERSONAL INFORMATION?

Our policy is only to use personal information collected from business contacts for the business purpose for which it was collected.

We need to collect personal information so that we can provide our products and services, and conduct our business. We also collect personal information so that we can let you know about new ideas, initiatives or areas which may be of interest to you.

If, at any time, you do not wish to receive these kinds of communications, please let us know.

### 3. WILL YOUR PERSONAL INFORMATION BE GIVEN TO ANYONE ELSE?

We do not sell, rent or trade personal information about you to or with third parties. However, we may share your personal information with our related companies if this is required to provide you with a services or information which you have requested.

Healthy may disclose personal information to external service providers who help us operate our business. Examples of our external service providers include third party data storage providers, organisations or consultants who provide production or promotional services on our behalf or on behalf of our clients, and research organisations and consultants who conduct research on our behalf. If we engage external service providers, we take steps to ensure that those external service providers:

- comply with the APPs when they handle personal information
- are authorised only to use personal information for the limited purposes specified in our agreement with them

Where we engage external information technology service providers, we ensure that wherever possible, our data is stored within Australia. Some of our vendors do however store data in overseas locations, including but not limited to the USA and Germany. Otherwise, we will only disclose personal information if this is required by law or permitted under the Privacy Act.

### 4. SECURITY OF PERSONAL INFORMATION

Healthy takes reasonable steps to ensure the security of your personal information. Our premises are in secure buildings with restricted access. Our IT systems are password protected and we conduct regular audit and data integrity checks. We frequently update our anti-virus software in order to protect our systems (and the data contained in those systems) from computer viruses. In addition, all our employees are required, as a condition of employment, to treat personal information held by Healthy as confidential.

### 5. ACCESS AND CORRECTION

Under the Privacy Act, you have the right to:

- seek access to your personal information handled by us;
- ask us to update or correct your personal information when it is inaccurate, incomplete or out of date; and
- opt-out of receiving direct marketing communications from us.

If you wish to access the personal information that we hold about you, please contact us using the details set out at the end of this Privacy Policy.

### 6. ONLINE PRIVACY

When you visit our website, a small data file called a “cookie” is stored on your computer or mobile device by our server.

We use cookies to maintain user sessions (e.g. if you subscribe to the site to gain access to a publication, we use cookies so when you next visit you do not need to re-enter your details). Like most website providers, we generate statistics about how many people visit our site and how people use our website. We use web logs and cookies to do this. This enables us to keep our site relevant and useful. However, generally this information will not identify you. We

do not link this information back to your identity or other information that you have provided to us. We do not store any information that identifies you inside cookies.

Most web browsers are set by default to accept cookies. However, if you do not wish to receive cookies you may set your browser to either prompt or refuse cookies.

Sometimes our website contains links to other websites, for your convenience and information. When you access a website other than healthydigital.net, please understand that we are not responsible for the privacy practices of that site.

## 7. QUESTIONS AND COMPLAINTS

If you wish to make a complaint about how we handle your personal information, please contact us setting out your complaint in writing, and forward it to our Privacy Officer, using the contact details below. We will deal with all requests for access to personal information or complaints as quickly as possible and will endeavour to get back to you within a reasonable timeframe.

## 8. HOW DO WE HANDLE THE PERSONAL INFORMATION OF JOB APPLICANTS?

Healthy collects personal information about and from individuals who apply for employment with us. The information we collect includes the applicant's:

- personal contact details (including phone, email and home address) and gender;
- educational and employment history,
- relevant qualifications and experience including information which they provide regarding clients with whom they've worked in the past;
- eligibility to work in Australia; and
- referees' contact details.

In relation to job applicants, we may collect this information directly from the job applicant or indirectly from a third party, including from a recruitment agency. If necessary, we will also collect information about applicants from referees and from professional social networking sites like LinkedIn. If the applicant proceeds to the interview stage, we will collect information about the applicant's performance during interview.

Healthy uses the personal information we collect about job applicants to assess their eligibility and suitability for employment with the firm. The personal information we collected about contractors or suppliers is used by Healthy to assess their suitability to work with us and/or our clients. Generally, our assessment of applicants' or suppliers' personal information will relate to a particular role or project. However, we may also retain and use applicants' and suppliers' personal information to assess their suitability for other roles with Healthy or other projects. In some cases our clients will request personal information regarding suppliers or job applicants who are being hired for a particular client project. However, we do not disclose the personal information we collect from applicants or suppliers to any other person or entity outside of our related group of companies, without their consent.

## 9. WHERE TO GET MORE INFORMATION

This Privacy Policy may change from time to time. The Privacy Policy will be made available to anyone who requests it, whether at our offices or by use of our website.

PRIVACY OFFICER

Email: [power@healthydigital.net](mailto:power@healthydigital.net)

Further information regarding your privacy can also be obtained from the Office of the Australian Information Commissioner