

Privacy Policy



Policy

This Privacy Policy version is dated
December 23rd 2022

Note: Paraplegic & Quadriplegic Association of NSW (ABN 42 000 355 948) trading as Forward Ability Support and BrightSky Australia - Referred to as “we”, “us” or “our” in this Policy.

1. Introduction

This Privacy Policy together with our website terms of trade, explains how we collect, use, and disclose your personal information.

By accessing our website or using our services you consent to our use, collection and disclosure of your personal information, sensitive information, and health information in accordance with this Privacy Policy.

In this document the term personal information includes sensitive information and health information.

Where you provide information on behalf of another person, you must have their consent or the authority to disclose that information to us.

2. Changes to our Privacy Policy

We may make changes to our Privacy Policy at any time:

- Any changes we may make to our Privacy Policy will be posted on our website,
- The version of this Privacy Policy is current as at the date set out above.
- All communications, transactions and dealings with us will be subject to the latest version of this Privacy Policy in force at the time.

3. Third party links

Our website may include links to other websites, plug-ins and applications provided by other parties, including those acting on our behalf. You are aware and acknowledge that:

- Clicking on those links or enabling those connections may allow third parties to collect or share data about you in accordance with their own privacy policies.
- We do not control third party websites and we are not responsible for their privacy practices or policies. You should review the privacy policy of any third party and any applicable terms of use when you use their websites, plug-ins and applications.

4. The personal information we collect about you

We may collect, use, store and process personal information for the purposes set out in section 6. The personal information which we collect about you includes:

- Identity information, including your name, title, organisation name, gender, and date of birth.
- Contact information, including billing address, delivery address, email address and telephone number(s).
- Purchase and transaction information, including details about payments to and from you and other details of products you have purchased from us. This information also includes bank account and credit card details.
- Health information, product scripts, your health services plans or other information we need to process any order you make, or subsidy or rebate you are entitled to.



- Government related identifier, including Tax File Number, Medicare number, or pension card number.
- Records of correspondence between us and you, whether by web form, telephone, email, text message, social media or otherwise.
- Customer service information, including your customer service enquiries and comments.
- Information that is automatically collected from your device, including IP address, device type, operating system, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information.
- If you apply for employment with us, details regarding your employment history, educational qualifications, and similar information.

If you are referred to us, enquire about our services or use certain services we offer, we may also collect, use, store and process your additional personal information for the purposes set out in section 6.

This additional personal information (being sensitive information and health information) includes the following:

- Financial information, including your government, superannuation or pension entitlements.
- Medical information including medical history, medications, allergies, adverse events, immunisations, hospital and clinical history, family history and risk factors.
- Other health information about you, including but not limited to:
 - notes of your symptoms or diagnosis and the treatment given to you;
 - your specialist reports and test results;
 - your appointment and billing details;
 - your prescriptions and other pharmaceutical purchases;
 - accident and injury/disease details; and
 - vaccination status and other COVID-19 related information.

5. How is your personal information collected?

We use different methods to collect personal information from and about you including through:

- The forms you complete online, in person or at our premises, or by corresponding with us by post, telephone, email or otherwise. This includes information you provide when you:
 - create an account with us;
 - subscribe to our service and newsletter;
 - request marketing information including in relation to our products and services to be sent to you or when you respond to marketing information;
 - make a payment to us;
 - give us feedback;
 - request or receive a service or product from us; or
 - enquire about our supports and / or services.
- Your interactions and use of our website, products and services, such as your location data, website usage and other communication data.
- Your authorised representative when they engage with us on your behalf.
- Government agencies, regulators, or other organisations.
- Your residency or attendance at our premises.
- CCTV at our premises. CCTV cameras are installed in and around our premises and will record your image. If you do not wish to be recorded, please do not attend our premises.
- Referral from third parties such as your other health service providers.
- From other sources like marketing lists, public information, credit lists and other commercially available information.
- Our related entities and business partners and service providers.



6. Purposes for which we may collect or use your personal information

We may collect and use your personal information for any purpose reasonably necessary for or directly related to, our functions or activities, including any of the following purposes:

- To register you as a recipient of our services or as an authorised representative of a recipient of our services.
- To process, manage and deliver your orders and services to you. This includes any subsidies, rebates, benefits, entitlements, or insurance claims in relation to the services we provide to you.
- To provide information to you about our services, allow us to provide our services to you, consider your eligibility for our services or to otherwise fulfil our obligations arising from any contracts entered into between you and us.
- To manage our relationship with you, including dealing with any complaints or credit or debt issues.
- To notify you about changes to our terms of use or Privacy Policy.
- To administer and protect our organisation and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data, network, security, and fraud protection activities).
- To improve our website, products or services, marketing, customer relationships and experiences including through analysis and business intelligence techniques.
- Direct marketing including to send you our newsletter or to make suggestions and recommendations to you about our products and services and third-party goods, services, events and offers that may be of interest to you.
- To ensure the safety and security of our employees and other clients. This includes requesting and recording your vaccination status and other COVID-19 related information.
- To comply with legal obligations and other compliance requirements.
- Any other purposes which you were informed of at the time of collection or to which you have consented.

7. How is your personal information collected?

You may decide not to provide personal information to us, however:

- If you do not provide your personal information to us, we may not be able to provide or continue to provide you with our products and services.
- You can always opt out from receiving our newsletter or direct marketing from us at any time without impacting your supports and services. You can opt out by selecting the unsubscribe link or replying to an email with “**unsubscribe**” or “**stop**”. You can also contact us directly on **(02) 8741 5600**.

8. Disclosure of your personal information

We may share your personal information, as required to reasonably conduct our business and to provide you with your supports and service, with the persons and organisations set out below:

- Healthcare providers such as medical practitioners and allied health professionals engaged by us to allow us to provide the services requested by you or where we refer you to these healthcare providers.
- External organisations including the National Disability Insurance Agency or other agencies or organisations in order to process any subsidy, rebate or other entitlement for which you are eligible.
- Regulators, law enforcement and credit and debt collection services.
- Third parties, including authorities, where we are legally obliged or authorised to disclose your personal information.
- Third parties such as suppliers, agents, contractors and partners who assist us with our business processes and to provide our products and services including in relation to:
 - IT services;
 - providing, managing, supporting and improving our website, products, services and organisation;
 - identity and fraud protection services;
 - marketing (including direct marketing) and market research services; and
 - business analysis and business intelligence services.
- Professional advisers (including lawyers, bankers, auditors, audit assessors and insurers who provide consultancy, banking, legal, insurance or accounting services).



9. Storage and security of your personal information

We may use third party service providers for the storage and security of your personal information which we may collect:

- These third party service providers may process and store your personal information and may be located outside Australia (such as the United States).
- We have security measures in place, which aim to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

10. Cookies

Our website may use cookies. These cookies are small pieces of data which collect information, we may use cookies to improve your experience of our website:

- If you disable or refuse cookies, some parts or features of our website may become inaccessible or not function properly.
- Some of our cookies are provided by third parties in accordance with their own privacy policies. The information these third parties collect may be transferred to, and stored at, a location outside your state of residence or Australia.

11. How long do we retain your personal information?

We may retain your personal information for:

- As long as necessary to fulfil the purposes we collected it for, including:
 - the purposes of satisfying any legal, accounting, or reporting requirements; or
 - for delivering services to you.

12. Accessing and correcting your personal information

To enable us to provide our products and services to you, it is important the information we hold about you is up to date and complete.

- Please let us know if your details change or if you believe any information we hold about you is inaccurate or incomplete.
- We will endeavour to amend any personal information about you which is inaccurate or incomplete.

13. Concerns about our collection, use or disclosure of your personal information

If you have any concerns or questions about our handling of your personal information you can:

- Contact us using the details provided below.
- Make a formal complaint by providing the complaint to us in writing and detailing the information relevant to your complaint.
- We will try to respond to all legitimate written requests by you regarding your personal information within 30 days after receiving them.
- Occasionally it may take us longer if your request is particularly complex or you have made several requests. We will let you know and keep you updated if we cannot respond in 30 days.
- If we have not responded to you within a reasonable time or if your complaint is not resolved to your satisfaction, you are entitled, under the Privacy Act 1988 (Cth), to make a complaint to the Office of the Australian Information Commissioner and can find more information on the Commission's website www.oaic.gov.au.

14. Interpretation of this Privacy Policy

In this Privacy Policy:

- personal information, sensitive information and health information have the meaning given in the Privacy Act 1988 (Cth); and
- a reference to any of the words "include", "includes" and "including" must always be read and interpreted without limitation.

Personal information may include sensitive information (including health information).

15. Contact

If you have any questions, concerns, or complaints about how we handle personal information, please contact us using one of the below methods:

Forward Ability Support

- Calling Forward Ability Support on 02 8741 5656
- Contacting using the online form available [here](#)

BrightSky Australia

- Calling BrightSky Australia on 02 8741 5631
- Contacting using the online form available [here](#)



Interpreter Service

If you prefer to use a language other than English, you can contact us through the Telephone Interpreter Service (TIS) on 131 450.

National Relay Service

If you are deaf or have a hearing or speech impairment you can call us through the National Relay Service (NRS) on 133 677 for TTY/ Voice or 1300 555 727 for Speak & Listen (SSR).

Definitions

Personal information

Personal information is information that identifies or could reasonably identify an individual. Examples of information commonly considered to be personal information are an individual's:

- Name,
- Address,
- Phone number,
- Date of birth,
- Age,
- Bank or credit card details, and
- Medical records.
- The following are all types of personal information:
 - **'sensitive information'** (includes information or opinion about an individual's racial or ethnic origin, political opinion, membership of a political association, religious beliefs, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation, genetic information about a consumer that is not otherwise health information, or criminal record, provided the information or opinion otherwise meets the definition of personal information)
 - **'health information'** (which is also 'sensitive information')
 - **'credit information'**
 - **'employee record'** information (subject to exemptions), and
 - **'tax file number information'**.

Consumer

Includes employees, members, participants, clients, residents, tenants, and customers or any other individual on which we may hold personal or sensitive information.

Health information

Includes any information collected about consumer's health or disability, and any information collected in relation to a health service a consumer has received. It includes such things as consumer's:

- Notes of the symptoms or diagnosis and the treatment given to them,
- Specialist reports and test results,
- Appointment and billing details,
- Prescriptions and other pharmaceutical purchases,
- Dental records,
- Genetic information, and
- Healthcare identifier when it is collected by a health service provider.



Legislation and/or Reference Documents

Privacy Act 1988 (Cth)

Health Records and Information Privacy Act 2002

NSW Privacy and Personal Information Protection (PPIP) Act

NSW Disability Services Act

Privacy Amendment (Enhancing Privacy Protection) Act

ISO 9001:2015

ISO 45001

ACIS 4.0

NDIS Practice Standards

Associated Documents

Code of Conduct

Workplace Surveillance and Team Member Information Policy

Consent for Using and Sharing Personal Information



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