

ORGANISATIONAL STATEMENT

NIRODAH is committed to protecting the personal information entrusted to it. NIRODAH has a strong commitment to maintaining the security and integrity of personal information within our care. We endorse the Australian Privacy Principles contained in the Privacy Act 1988 and support the role that the Australian Privacy Commissioner within the Australian Human Rights Commission plays.

The purpose of this privacy policy is to:

- give individuals a better and more complete understanding of the sort of personal information that NIRODAH holds, and the way we handle that information
- clearly communicate the personal information handling practices of NIRODAH, and
- enhance the transparency of NIRODAH'S operations.

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not. We have addressed how we manage the personal information of customers, employees and suppliers separately below.

SCOPE

This policy applies to all staff and contractors employed to NIRODAH as well as clients and customers that use NIRODAHs services.

FRAMEWORK

What Information we collect

We collect a range of information from our clients and customers that is directly related to the products and services we provide. Where we wish to use the information for other purposes we will seek your agreement beforehand. The kind of personal information we collect can include: name, contact details, location, demographic information like gender, age, relationship status, Medicare information and so on.

Email and SMS Subscription Lists

We currently have an electronic Direct Marketing (eDM) email list which provides marketing offers to subscribers. If you elect to subscribe to our eDM, these services will be provided to you to communicate product information, special events and offers. We also use search engine and social media sites to make marketing offers which may be of interest to you. Our marketing subscription list is an 'opt in' system. [eNEWS](#) You may unsubscribe easily by clicking on the unsubscribe link that appears in all of our marketing communications to you.

How We Collect Information

As much as possible we collect information directly from our customers. We do this in a number of ways, including when you:

- provide us with personal information over the phone or through personal mobile computing devices, like smart phones and tablets;
- fill out forms; or
- submit your personal details through our website.

We also collect solicited personal information indirectly, through publicly available sources, or through social media sites, like Facebook, Twitter, Google and others, who disclose to their users that the users' personal information is provided to businesses like NIRODAH. We do this where:

- the customer has consented to such collection or would reasonably expect us to collect their personal information in this way, or
- if it is necessary for a specific purpose such as the investigation of a privacy complaint

We usually only retain unsolicited information about our customers when dealing with a customer enquiry or complaint or where we conduct an investigation.

Using Personal Information

We use personal information to better understand our customers' interests and needs, to complete purchase transactions and complete required Medicare reporting.

We use personal information in the following ways:

- Medicare Number, Referring GP, Gradian Details and Personal Details
- Provide, deliver, source, administer, improve and personalise our products and services;
- Process payments and provide refunds and discounts;
- Provide more relevant marketing offers through direct marketing, database compilation, data analysis and segmentation, and the processing or creation of other marketing information;
- Combine or compile with publicly available information for the processing or creation of marketing offers and information;
- Fraud prevention, including services regarding the protection of our customers' information, eg. credit card information;
- Develop and expand our operations to better suit our customers' needs, such as planning for future store locations;
- Maintaining and keeping our customers information current and as accurate as possible;

Disclosure

We do not disclose personal information to third parties unless we are permitted to do so by law or you have given us your consent to do so. Third parties we may disclose personal information to include:

- Our professional advisors including our accountants, auditors and lawyers;
- Payment system operators and financial institutions; and
- Government agencies.

Data security

We take active steps to protect the personal information we hold against loss, unauthorised access or use, modification or disclosure, and against other misuse.

When the personal information that we collect is no longer required, we destroy, delete or de-identify it in a secure manner.

While no service is completely secure, CLUB RESPECT takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. We ensure we only partner with document storage and data centres that encrypt content. In addition, sensitive information such as credit card number and password that we request from you through our services is protected with encryption, such as Secured Socket Layer (SSL) protocol, during transmission over the Internet.

The servers on which personal information is stored are kept in a controlled environment with limited access. While we take reasonable efforts to guard personal information we knowingly collect directly from you, no security system is impenetrable.

Cookies

When you interact with us on the internet, our system automatically sends you a 'cookie'. A cookie is a small amount of information sent from a web server to your computer, electronic tablet or smart phone that enables your device to be recognised. It is used to handle your internet sessions on that device and contains a unique identifier.

Other information stored by the cookie includes website traffic data. This data is not used to identify individual details. We only collate the data into anonymous results in order to evaluate and improve our internet and shopping service for our customers.

Spam

We will never knowingly send you electronic messages without your consent. For more information on the Spam Act 2003, please

visit <https://www.legislation.gov.au/Details/C2016C00614>

Use of Credit Card Information

If you give us credit card information, we use it solely to check your financial qualifications and collect payment from you. We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use information you provide except for the sole purpose of credit card processing on our behalf.

Your Privacy choices

You can access the personal information that we hold about you and you can ask us to correct the personal information we hold about you.

If you are listed on one or more of our Direct Marketing email lists you can opt out at any time. You can unsubscribe by using the 'unsubscribe' options contained in our emails.