



SECOND SKIN PRIVACY POLICY - AUSTRALIA

1. Who we are

Second Skin Pty Ltd (ACN 009350467) ('we', 'us', 'our') is a limited company incorporated in Australia.

This statement describes how we collect, use and share any personal information we have about you.

We are committed to respecting and upholding your rights to privacy protection under the Australian Privacy Principles contained in the Australian Privacy Act 1988 (as amended March 2014).

When we share your personal information with a third party in accordance with this statement, that third party will be responsible for its own compliance with applicable personal information law in relation to such personal information.

2. What kinds of personal information about you do we hold?

In the course of providing services to you, we may collect, use and share information about you. This may include information from the following sources:

- information you have provided to us;
- information provided to us by third parties about you (such as your next of kin, carers, guardians, doctors, therapists, and hospitals); and
- information about you that we generate in the course of providing services to you.

This information may include:

Personal details (such as name, address, telephone number(s), e-mail address and other contact details, age, gender, date of birth);

Family, lifestyle and social circumstances (such as details of your next of kin, carers, and other household members and your marital status);

Financial details (such as how you are going to pay for services we are providing to you, including the existence of any fundraising efforts, health or medical insurance to pay for the services we are providing to you);

Professional details (such as your occupation);

Your medical professionals (such as your general practitioner and your treating specialists/therapists);

Insurance details (such as whether you are covered by medical or health insurance, your policy number);

Health information including:

- information about any medical condition you may have which is relevant to our service;
- what you and your doctors, therapists, nursing staff, medical practitioners, rehabilitation providers and other professionals hope to achieve through the services we are providing to you;

Photographs or videos of you taken at the time of your appointment(s) with us, or sent to us by your doctor/therapist or other healthcare professional; and

Transaction records associated with services we have provided to you (such as what garments have been provided in the past, how many garments have been provided, how these were paid for, invoice details for services we have provided to you, details of any special rates or discounts that have been applied).

Second Skin seeks to **destroy or de-identify** personal information after its legal obligations to retain the information have expired. Generally, to meet our legal obligations, Second Skin retains records (including personal information) for 7 years after the client’s last consultation and, in the case of children, records (including personal information) are retained until the client is 25 years old, or 7 years after the client’s last consultation, whichever is later.

3. What do we do with your personal information?

We use personal information about you:

- to provide and manage the treatment and care we provide to you, including anything to do with any garment or splint we provide to you;
- to assist with any calls or enquiries you make to us;
- for our internal administrative requirements;
- to provide information to, and to assist, your teachers, doctors, therapists, nursing staff, medical practitioners, rehabilitation providers and other professionals who provide treatment or care to you;
- to provide information to you, your relatives, guardians or other persons associated with you;
- to respond to personal information access requests from you;
- to plan the services we provide or intend to provide to you;
- for credit assessment (including assessment of your ability to meet your financial commitments);
- for recovering debt;
- to comply with any present or future law, rule, regulation, guidance, decision or directive (including those concerning anti-terrorism, fraud, money laundering and anti-corruption);
- to establish, exercise or defend legal rights;
- to prevent or detect breaches of law, regulation and our policies, and to apprehend and prosecute offenders, including in relation to the prevention of money laundering and fraud;
- to comply with demands and requests made by domestic and foreign regulators, governments and law prevention, detection, investigation and enforcement authorities (including crime, fraud investigation, enforcement and prevention, tax, social or labour authorities, customs authorities and any other authorities or official bodies), courts, tribunals, arbitrators, ombudsmen, mediators and dispute resolution bodies and their representatives;
- to obtain legal, accounting and other professional advice;
- to obtain advice or provide a third party with information about our business in connection with any sale, merger, acquisition, disposal, joint venture, reorganisation or similar change of our business; and
- for any other purposes that are incidental to or connected with the foregoing purposes or otherwise in the course of our legitimate business activity.

With your consent, we may also use your personal information for:

- Medico-legal reports to solicitors, legal counsel, etc.

With your consent, we may also use your personal information for the purposes listed below (in relation to which, unless we inform you otherwise when we obtain your consent, we will take reasonable steps to anonymise your personal information):

- research and evaluation;
- providing practical education and training to Second Skin staff;
- providing practical education and training to third party medical practitioners; rehabilitation providers and health professionals; and
- marketing (such as in brochures or newsletters supplied to therapists and other medical practitioners).

4. Disclosures

Second Skin may, from time to time, be required to disclose personal information about you to any of the following recipients or categories of recipients:

- your teachers, doctors, therapists, nursing staff, medical practitioners, rehabilitation providers and other professionals (where requested by you or your health professional);

- any person that you request or permit us to keep informed of our activities in connection with you (such as your relatives, guardians, carers and other health professionals, solicitors and other legal and professional advisors). **If you no longer wish us to share your personal information with any such person or to make a change, please contact us** (see 'Contacting us' at Item 10);
- our third party service providers and business associates (including their employees, directors and officers) that we engage;
- our other offices within our corporate group which may include sharing information with our office located overseas in the United Kingdom;
- any person in connection with any actual or proposed sale, merger, acquisition, disposal, reorganisation, joint venture or similar change of our business;
- domestic or foreign regulators, government and law investigation, prevention, detection and/or enforcement authorities, including crime, fraud investigation, enforcement and prevention, tax, social or labour authorities, customs authorities and any other authorities or official bodies;
- domestic and foreign courts, tribunals, arbitrators, ombudsmen, mediators and other dispute resolution bodies and their representatives;
- professional advisers and auditors that we engage;
- professional and self-regulatory bodies; and
- credit and debt recovery agencies.

5. Storage and security

Second Skin stores personal information:

- a. contained in paper based and other hard copy documents in a dedicated storage facility located in our head office premises or regional offices, and
- b. contained in electronic records in a secure environment.

Such records are only accessible by those persons who require access to the personal information for the purpose of carrying out their employment.

- The Second Skin website allows visitors to upload photos and videos to the company's webserver, which are then automatically moved to our internal fileserver for processing.
- There is no external access to the upload section of Second Skin's webserver or fileserver. This ensures it is secured from external access.
- Internal accessing to the fileserver is password protected. All Second Skin computers, including the file server, are secured with Symantec Endpoint Protection, which protects against viruses and has firewall and intrusion protection.
- Access to sensitive personal data on each client is restricted to those who are directly involved in the assessment, manufacture or administration of that client's care.
- All Second Skin therapy staff that handle personal data and provide services to the client are registered health professionals; or work under their supervision to manufacture the medical splint or garment.
- All staff that have contact with clients are required to have Working with Children and Police Record checks before commencing their employment.

Second Skin does not store information about credit card or other personal payment details.

6. Updating your information

It is important for us to maintain accurate records of your personal information. Please contact us (see "Contacting Us" at Item 10) to inform us of any changes to, or errors in, your personal information as soon as possible. If the information that is corrected is information that we have provided to others, you can ask us to notify them of the correction. We do not charge a fee for such requests.

7. Accessing your information

You may request access to your information that we hold by contacting us (see "Contacting Us" at Item 10). Whilst there is no fee for making the initial request, in some cases, there may be an

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access charge to cover the time we spend in preparing and providing the information to you.

8. Making a privacy complaint

If you have any concerns about privacy or personal information related matters, you have the right to make a complaint. You can lodge a complaint by contacting us (see 'Contacting us' at Item 10).

When we receive your complaint, we will contact you as soon as possible to assist in resolving the complaint and to advise you of a timeframe for resolving the complaint.

If you are not satisfied with our handling of your matter through the process set out above, you can refer your complaint to the Office of the Australian Information Commissioner. More information about the Office of the Australian Information Commissioner is available at www.oaic.gov.au.

9. Notification of changes

This statement represents our policy as at August 2016. We may change this statement from time to time. This may be for a number of reasons, including changes in the law, best practice or our treatment of your personal information. Any updates will be on the Second Skin website.

10. Contacting us

If you have any questions about this policy or any concern regarding the treatment of your personal information by Second Skin, would like to update or amend your personal information, make any complaint about our handling of your personal information, or exercise any of your rights under the privacy law, please contact us using the details set out below:

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