



PRIVACY POLICY VETERINARY PRACTICE PARTNERS

For partners, employees, contractors and clients of the VPP Group and clinics.

1. Why we collect personal information and how we may use it

Personal information means information we hold about you from which your identity is either apparent or can be reasonably determined which may include but not be limited to your name, address, telephone number, email address and photograph.

Generally, Veterinary Practice Partners (**VPP**) including clinics, partners, employees and contractors within the VPP group will collect personal information directly from you, only to the extent necessary.

We will collect personal information from you when:

- you fill in an application form;
- deal with us over the telephone;
- email us;
- ask us to contact you after visiting our website; or
- have contact with us in person.

The reference to “us” or “we” in each of the above and within this Privacy Policy includes, where relevant, Veterinary Practice Partners Pty Ltd A.C.N 159 417 151 (a company incorporated under the laws of Australia), and partners, employees and contractors within the ‘VPP’ group, in addition to any related bodies corporate of any of the aforementioned, which we refer to in this document as the **VPP Group**.

We store your personal information electronically or in hard copy.

We will collect personal information from you by lawful and fair means and not in an unreasonably intrusive way.

We will use your personal information only for the particular purpose that you provided it which is to provide our services to you or for a directly related purpose such as required or permitted by law or with your consent. To enable us to provide those services, we will disclose your personal information to those relevant entities which are members of the VPP Group.

We do not share your personal information with other organisations outside the VPP Group unless you give us your consent, or where sharing is otherwise required or permitted by law, or where this is necessary on a temporary basis.

We will not disclose your personal information to overseas recipients. When we temporarily provide personal information to companies who perform services for us, such as specialist information technology companies or other contractors, we require those companies to protect your personal information as diligently as we do.

2. Your rights and choices

You may interact with us anonymously or use a pseudonym where this is lawful and practicable.

You have the right to request access to the personal information you provide, and to correct or update your personal information. This right is subject to certain exceptions allowed by law (see below at point number 4). You may instruct us to remove any previous consent you provided to receive marketing communications from us. You may contact us on the following telephone number: 03 9699 5972 or email address: info@veterinarypracticepartners.com.au. Please address your correspondence to “Privacy: Legal Department”.

Direct marketing and your privacy

From time to time we may use the personal information we collect from you to identify particular VPP services which we believe may be of interest to you. We may then contact you electronically, by phone or in hard copy to let you know about these services and how they may benefit you. We will always give you a choice to opt out of receiving such information in future.

Surveys

From time to time we may use the personal information we collect from you to survey your opinion about our services. We will always give you a choice to opt out of participating in such surveys.

3. Your privacy preferences and choices

Every personalised marketing contact sent or made by VPP will include a means by which customers may opt out of receiving further marketing information.

You may instruct us at any time to remove any previous consent you provided to receive marketing or survey communications from us.

4. Information sharing

We have a duty to maintain the privacy of all personal information we hold about you. However, certain exceptions do apply. For example, where disclosure of your personal information is:

- (a) authorised or required by law, for example: disclosure to various government departments and agencies such as the Australian Taxation Office, CentreLink, Child Support Agency, or disclosure to Courts under subpoena.
- (b) in the public interest, for example: where a crime, fraud or misdemeanour is committed or suspected, and disclosure against the customer's rights to confidentiality is justified.
- (c) with your consent - your consent may be implied or express and it may also be verbal or written.

5. Updating your information

It is inevitable that some personal information which we hold will become out of date. We will take reasonable steps to ensure that the personal information which we hold remains accurate and, if you advise us of a change of details, we will amend our records accordingly.

6. Access to your personal information

VPP will, upon your request, and subject to applicable privacy laws, provide you with access to your personal information that is held by us. However, we ask that you identify, as clearly as possible, the type/s of information requested. You may be required to provide us with personal identification.

VPP will deal with your request to provide access to your personal information in a reasonable time – usually within 30 days of receipt of your request. See point 2 above on how to contact us regarding your personal information held by us.

VPP will not charge you for lodging such a request but we may recover from you our reasonable costs incurred in supplying you with access to this information.

Exceptions

Your right to access your personal information is not absolute. In certain circumstances, the law permits us to refuse your request to provide you with access to your personal information, such as circumstances where:

- (a) access would pose a serious threat to the life or health of any individual;
- (b) access would have an unreasonable impact on the privacy of others;
- (c) the request is frivolous or vexatious;
- (d) the information relates to existing or anticipated legal proceedings;
- (e) the information relates to a commercially sensitive decision making process;
- (f) access would be unlawful; or
- (g) access may prejudice enforcement activities, a security function or commercial negotiations.

7. Information security

VPP is committed to keeping your trust by protecting and securing your personal information.

We employ appropriate technical, administrative and physical procedures to protect personal information from unauthorised disclosure, loss, misuse or alteration.

We limit access to personal information to individuals with a business need consistent with the reason the information was provided.

8. Information transfer including Overseas

Your personal information may be stored on a server in another jurisdiction outside of Australia. Furthermore, if your personal information has been obtained in a country outside Australia, your personal information may be transferred to Australia. If VPP otherwise transfers personal information to countries outside Australia, we will only do so in compliance with all applicable Australian data protection and privacy laws.

9. Complaints

Information privacy complaints (**Privacy Complaint**) should be made to the VPP Legal Department within 30 days of the alleged breach occurring.

Privacy Complaints will be included in a Privacy Complaints Register.

A member of the VPP Legal Department will investigate the Privacy Complaint under the Chief Executive Officer's supervision in consultation with any appropriate managers or other personnel.

The VPP Legal Department will:

- (a) be a contact point for any person wishing to make a complaint;
- (b) receive and ensure any written Privacy Complaint is acknowledged;
- (c) ensure the complaint is recorded in the Privacy Complaint Register;
- (d) seek further information, including any documentation the complainant wishes to add during the investigation process;
- (e) identify the outcome the complainant seeks as a consequence of submitting the complaint (e.g. an apology);
- (f) ensure the Privacy Complaint is investigated and assess the complaint;
- (g) ensure the investigation process is documented, including names of staff consulted, and interview notes are taken;
- (h) seek technical and/or legal advice through the Office of the Australian Information Commissioner and/or a Legal Professional as appropriate;
- (i) upon completion of the investigation and seeking any technical / legal advice, make a determination whether to:
 - allow the complaint; or



- allow the complaint in part; or
 - decline to allow the complaint; or
 - if the complaint is allowed in full or in part, provide a resolution;
- (j) notify the complainant in writing of the outcome. The reasons for the decision must be outlined. The letter should also notify the complainant of the right to appeal to the Privacy Commissioner if the complainant remains dissatisfied with the outcome reached.

Privacy Complaints can be made orally or in writing.

Oral Complaints

Oral complaints (e.g. complaints over the telephone or in person) can be received by the Chief Executive Officer or his/her delegate (for example, a member of the VPP Legal Team) when the complaints are judged by the complainant and the Chief Executive Officer or his/her delegate, as capable of resolution within five working days. A file note will be made of the complaint and the outcome for record keeping purposes. The Chief Executive Officer or his/her delegate may decide to confirm the outcome in writing.

Complex Complaints

If the Chief Executive Officer or his/her delegate believes that a complaint is complex or requires investigation, then the complainant will be invited to submit a complaint in writing.

The Chief Executive Officer or his/her delegate will assist complainants, if requested or if it appears that the complainant requires assistance in the drafting of the complaint.

Time Limit

We will endeavor to make a decision on all written complaints within 20 working days after the day the complaint was received. Discussion can take place with the complainant for an extension of time if circumstances suggest this is appropriate (e.g. temporary absence of staff relevant to the complaint).

Privacy Complaints Register

The Chief Executive Officer or his/her delegate will establish a secured register to keep account of the status of Privacy Complaints.

Advice and Assistance

Further advice and assistance is available from the Chief Executive Officer or a member of the VPP Legal Team on telephone 03 9699 5972 or on info@veterinarypracticepartners.com.au.