

UFS Dispensaries Ltd Privacy Policy

The Privacy Policy of UFS Dispensaries Ltd has been developed in accordance with National Privacy Principles, and complies with The Privacy Act. This policy details how UFS will collect, store, manage and disclose sensitive and personal information about our customers and members.

Collection

UFS collects the following types of information:

- i. **Membership Information:** This is collected for the purposes of membership management. Information collected includes name, phone number, address and details of dependant family members. The information collected is not passed onto to any third party, and is treated in accordance with wishes expressed by members at the time of joining or renewing their membership.
- ii. **Accounts Information:** This is collected for the purposes of account management only and for no other purpose. Information on account status will not be passed to any parties other than the primary account holder without their express permission.
- iii. **Dispensary Records:** This information is collected for the purposes of safe and accurate dispensing of medication and as required by legislation. The information that is collected includes name, address, medication details, member number if applicable, medicare number, or any concession numbers if applicable.
- iv. **Recruitment:** This information is collected for the purpose of recruiting new employees. Generally this information is obtained in the form of personal resumes. The information collected includes name, address, previous employment, qualifications and work experience. This information collected is not passed on to any third party, and is treated in accordance with wishes expressed by applicants at the time of applying for a position.
- v. **Competitions:** This information is collected purely for the purpose of instore promotions. The information collected includes name, address, contact number, copy of receipt with purchase history may be attached and membership number (if necessary). This information is not passed onto any third party and is treated in accordance with the Privacy Act.
- vi. **Photo Processing:** This information is recorded in duplicate both on the processing bag and on a central record in each store. The information collected includes the customer's name and address. This information is not passed onto any third party, and is treated in accordance with wishes expressed by customer at the time of putting in their film.

Use and Disclosure

Membership Information is used for the purpose of mailing MemberCare News and other member information, including additional cards, annual renewal, annual reports and notice of Annual General Meeting. Membership and sales data is not disclosed to any third party unless a member expressly consents, or where required by law.

Account Information is only used for purposes of account management. Information relating to an account is not disclosed to any third party, without the primary account holders express consent, or where required by law.

Recruitment Records are used for the purpose of sourcing candidates for positions vacant.

Competitions / Instore Promotions Information is used for the purpose of identifying and contacting winners of promotions and competitions and for this purpose only. The winners of these competitions will be publicly identified / acknowledged. The entry of a competition is deemed consent to publish winners details.

Photo Processing Information is collected for the purpose of ensuring photographs are accurately identified and given to the correct owner. Photos will be given out to the customer returning with duplicate collection receipt.

Dispensary Records are health records which are used to assist in the dispensing and delivery of medicines, process claims to the Health Insurance Commission, Department of Veterans Affairs, TAC, Workcover and other compensatory bodies. The lodgement of a prescription at a UFS Pharmacy will be deemed to be consent for the appropriate records of the prescription or other medication to be maintained at that pharmacy. A person collecting a prescription medicine on behalf of another person will be deemed to have consent if they are in possession of the prescription receipt chit issued at the time of lodgement. A person collecting a script on behalf of another person will be required to satisfy pharmacy staff that they have the individuals consent to collect the medication on their behalf.

Disclosure of individual health records to a third party only occurs when required for one of these purposes, or when required by law. When disclosure is required by law, where permitted UFS will advise the individual concerned of the disclosure.

Disclosure to a third party for other purposes (eg. calculation of PBS Safety Net entitlement, or taxation records) will only occur with the expressed consent of the individuals whose records are being disclosed. When a child or young person is not competent to make their own decision about the privacy of their information, UFS will disclose this information to the parent or guardian. In general, UFS will require written consent from children aged over 12 years.

Data Quality

UFS Dispensaries will take all reasonable steps to ensure the personal and health information the organisation collects, uses, holds and discloses is accurate, complete, up to date and relevant. We will do this by:

- Verifying the accuracy, completeness and relevance of personal and / or health information when it is collected; and
- Maintaining the accuracy, currency, completeness and relevance of the personal and health information we hold.

Data Security and Data Retention

UFS Dispensaries will take reasonable steps to ensure the personal and health information we hold is protected from misuse and loss, and from unauthorised access, modification or disclosure. We will do this through:

- The provision and use of lockable storage facilities for paper based records;
- The provision and use of appropriate security measures for electronic records, including password protection
- The maintenance of appropriate physical and security measures for UFS Dispensaries offices and facilities; and
- Restricting employee access to personal and health information on a “need to know” basis

Reasonable steps will be taken to destroy or permanently de-identify personal or health information if it is no longer required.

Openness

UFS Dispensaries will be open in how it manages the personal and health information it collects.

Access and Correction

UFS Dispensaries will provide individuals with access to their personal and or health information on request, except to the extent that:

- Providing access would pose a serious threat to the life or health of any individual;
- Providing access would have an unreasonable impact on the privacy of another individual;
- The request for access is frivolous or vexatious;
- For health information, the request is unreasonable and repeated, with access to the same information having previously been reported
- There are considerations with regard to legal proceedings which are underway, being investigated or anticipated
- Providing access would be unlawful.

Any requests for access of personal or health information held by UFS Dispensaries requires the individual to fill in a Request for Information Form which can be found on our website www.ufs.com.au or by contacting one of our pharmacies.

Information may only be given to the owner of the information or to someone authorised to collect it. Information will generally be available for collection within 24 hours.

If an individual identifies that the information held by UFS Dispensaries about them is inaccurate, incomplete, misleading or not up to date, they may request that the information be corrected. UFS Dispensaries will then make all reasonable efforts to correct the information.

Requests for access or correction of personal or health information are to be made to:

The Privacy Officer
UFS Dispensaries
PO Box 301
BALLARAT 3353

Identifiers

A membership number will be allocated to each member as an identifier of that member for the purposes of UFS Dispensaries operations.

An identifier assigned to an individual by another agency or body will not be used or disclosed, unless required by law or express consent is given.

Anonymity

Wherever lawful and practicable, UFS Dispensaries will provide individuals with the option of being provided with a product or service by us on an anonymous basis.

Transborder Data Flows

Under the National Privacy Principles UFS Dispensaries will not disclose an individual's personal information to an organisation or individual outside Australia unless, generally, the country to which it is being disclosed has a similar level of privacy protection or the individual, or their authorised or legal representative, has consented to the disclosure.

Under the Information Privacy Principles and Health Privacy Principles we will not disclose an individual's personal and or health information to an organisation or individual outside Victoria unless, generally, the state or country to which it is being disclosed has a similar level of personal information and health records protection or the individual, or their authorised or legal representative, has consented to the disclosure, or the disclosure is required by law.

Sensitive Information

Sensitive information will not be collected unless;

- The individual has consented such collection; or
- The collection is required by law; or
- The collection is necessary to prevent or lessen a serious and imminent threat to the life or health of an individual.

UFS Dispensaries will not disclose any sensitive information without the consent of the individual.

Complaints

Should an individual, or their authorised or legal representative, have a complaint regarding our privacy practices or wish to make a complaint about how their personal / and or health information has been managed, they should in the first instance contact the UFS Dispensaries Privacy Officer on (03) 5327 7700. Any complaints received will be handled in accordance with our Privacy Complaints Policy.