

Mappa Privacy Policy

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Approval: Chief Executive Officer

Name: Des Martin

Signature:

Aboriginal Health Council of Western Australia ABN 48 114 220 478 (“**AHCWA, we, our or us**”) owns and operates the Mappa Health Services website (accessible on <https://mappa.org.au> and <https://mappa.net.au>) and related websites, social media sites and apps (collectively the “**Mappa Website**”). We are committed to respecting your privacy in your interactions with the Mappa Website and collection of your personal information is in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles therein.

PLEASE ENSURE THAT YOU READ THE MAPPA PRIVACY POLICY (“**PRIVACY POLICY**”) CAREFULLY AS IT APPLIES TO ALL PERSONAL INFORMATION COLLECTED BY US IN RELATION TO YOUR INTERACTION WITH THE MAPPA WEBSITE.

1 Definitions

1.1 The followed definitions apply to this Privacy Policy:

Health Service Providers means collectively for the purpose of this Privacy Policy:

- a) Health service providers including Aboriginal Community Controlled Health Services; WA Country Health Services and Metropolitan Health Services etc.;
- b) Health sector peak bodies;
- c) Head offices of health service provider chains;
- d) Related health sector organisations such as Alcohol and Other Drug organisations etc.

Health Service Provider information means publicly available information relating to Health Service Providers that is made available to you via the Mappa Website.

Mappa Website means collectively the Mappa Health Services websites (<https://mappa.org.au>, <https://mappa.net.au>, <https://mappanews.org.au>, <https://mappaprototype.org.au>), and Mappa’s related websites, social media sites and apps.

Personal information is defined in the Privacy Act and means information or an opinion about an identified individual, or an individual who is reasonably identifiable. For example, this may include, but is not limited to, your name, age, date of birth, gender, contact details and postcode, financial information, including your credit card information, or a photograph of you. Personal information does not include anonymous, aggregated or de-identified information or information about companies which does not identify individuals.

Privacy Act means the Privacy Act 1988 (Cth) and the incorporated Australian Privacy Principles.

Terms means collectively the Mappa Website Terms and Conditions – Front End User and Mappa Website Terms and Conditions – Information Contributor, available on the Mappa Website.

2 Acceptance of this Privacy Policy

- 2.1 The Mappa Website is a web-based mapping platform that works to put information about health services and providers in remote and regional areas on the map and help Aboriginal and Torres Strait Islander people connect to their local health services.
- 2.2 By accessing and/or using the Mappa Website, you indicate your acceptance to be bound by this Privacy Policy and the Terms and agree that you have had sufficient opportunity to read and understand them.
- 2.3 By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy. If you do not agree to this Privacy Policy, you should immediately cease using the Mappa Website.
- 2.4 We may update this Privacy Policy from time to time by publishing changes to it on the Mappa Website. It is recommended that you check the Mappa Website periodically to ensure that you are aware of our current Privacy Policy.

3 Personal information we collect

- 3.1 We collect personal information only where it is reasonable and necessary to deliver the Mappa Website and our services (and those of related service providers as identified on the Mappa Website) to you or otherwise conduct the activities of AHCWA in relation to the Mappa Website.
- 3.2 We may collect the following types of personal information from you:
 - a) Personal details such as, but not limited to, your name, address, email, mobile and telephone number, date of birth;
 - b) History records of your communications and interaction with us and the Mappa Website;
 - c) Information relating to you that you provide to us directly or indirectly through your contact with us or your use of the Mappa Website;
 - d) Details or history of preference, interests and behaviour in relation to communications, interactions, services and activities on the Mappa Website;
 - e) Your IP address, web log and related domain, browser, computer and connection information, device ID, device type, geo-location information;
 - f) Statistics on your page views of the Mappa Website and the sites you were visiting before you came to the Mappa Website, traffic to and from and within the Mappa Website, and ad data;
 - g) Amendments and changes made to Health Service Provider information by you, for example, what changes have been made, when and by who.

- 3.3 We do not collect patient health information. Patient health information is subset of personal information and is defined in the Privacy Act as information or an opinion about the health of an individual, an individual's expressed wishes about the future provision of health services or a health service provided or to be provided to an individual.

4 Cookies Policy

- 4.1 See the Mappa Cookies Policy on the Mappa Website.

5 How we collect personal information

- 5.1 We may collect personal information from you in a variety of ways including:

- a) Directly from you, including when you:
 - Browse or interact with the Mappa Website;
 - Register an account or login to the Mappa Website;
 - Contact us e.g. with an enquiry or to provide information or feedback;
 - Interact with the Mappa Website e.g. click on the Mappa Website banners, hyperlinks or plugins;
 - Interact with any third-party content or hyperlinks on the Mappa Website e.g. click on any hyperlinks to Health Service Provider sites or material;
 - Interact with us in postal, phone, email, other electronic means, mobile application or social media correspondence;
 - Complete forms, surveys, questionnaires or other marketing or promotional activities for us;
 - Request information from us or have a conversation with our staff;
 - Attend meetings, workshops, conferences or other face-to-face interactions relating to Mappa and the Mappa Website;
 - Are online – see clause 3 above and the Mappa Cookies Policy available on the Mappa Website.
- b) From third parties such as our related Health Service Providers, contractors and suppliers; and
- c) From publicly available sources of information.

6 How we use personal information

- 6.1 We collect, hold and use personal information in order to deliver the Mappa Website, our services (and those of our related service providers as identified on the Mappa Website) and to otherwise conduct the functions and activities of AHCWA.
- 6.2 We may use your personal information for different purposes, including:
- a) to provide or connect you to our or our related Health Service Providers or their products and services;
 - b) to communicate with you, including about the Mappa Website, subscription, our products and services and those of our related Health Service Providers, and information which might interest you;
 - c) to answer your requests, questions and complaints, and provide you with information;

- d) to collect Health Service Provider information from you and to update Health Service Information on the Mappa Website provided by you;
- e) to enable your access, interaction and use of, the Mappa Website and any secure features and functionality of the Mappa Website;
- f) to gain an understanding of your information to develop, operate or improve the Mappa Website or our products and services;
- g) to improve your experience and interaction with us or the Mappa Website, including performing analytics, updating CMS performance and capability, improving subscription services, conducting research and for marketing and advertising;
- h) to provide you with better customer services and support;
- i) to carry out administration, marketing, planning, fraud and loss prevention activities, procurement, development, quality control and research to improve the way the Mappa Website, we and our related Health Service Providers provide products and services to you;
- j) to administer forms, surveys, questionnaires, and promote and market products, services or other promotional information, activities or events;
- k) to comply with laws and regulations or to comply with any directions given by regulators or authorities.

7 When we disclose personal information

7.1 We do not routinely disclose personal information to third parties, but may disclose your personal information where:

- a) you have given your consent;
- b) the use or disclosure is directly related to the primary purpose of collection, for example, it is necessary to provide you with information you have requested about a product or service;
- c) the use or disclosure is for secondary purposes that you would reasonably expect and is related (or in the case of sensitive information, directly related) to the primary purpose of collection;
- d) it is necessary for maintenance of or is related to your account or subscription with us;
- e) it will assist us in providing products or services you have requested or updating the same;
- f) it is necessary to manage or develop the Mappa Website;
- g) it is a requirement of our related Health Service Providers to provide their products or services to us or to you, in which case only basic personal information will be shared to the extent necessary;
- h) it is a requirement of our funders or partners, in which case only basic personal information will be shared to the extent necessary;
- i) we wish to conduct market/sector research and marketing strategy analysis;
- j) the use or disclosure is or otherwise required or permitted by laws, regulations or professional standards.

7.2 We may also share non-personal, de-identified and aggregated information to our related Health Service Providers, for research, market/sector analysis, funding, sponsorship, tender, subscription or promotional purposes, or to administer and improve the Mappa Website, our products or services, or those of our related Health Service Providers.

8 Who we disclose personal information to

8.1 We may disclose personal information for the purposes described in this Privacy Policy to:

- a) our employees, contractors, agents and related bodies corporate;
- b) our related Health Service Providers, who provide information about their products and services on or via the Mappa Website;
- c) third party suppliers and other service providers, including providers for the operation of the Mappa Website or in connection with providing or marketing our subscriptions, products and services, and those of our related service providers, to you;
- d) our funders, partners and professional advisors;
- e) specific third parties authorised by you to receive information held by us;
- f) those agencies for which the disclosure is required by law.

8.2 The Mappa Website is housed in Australia. However, we may disclose personal information outside of Australia, including to third party suppliers and service providers located in the United States of America depending on the nature of the services those recipients provide to us. For example, while the server and all Mappa Website data is stored in Australia, the platform is hosted by Amazon Web Services and is managed by CloudWays which are both American-based companies. We also use the marketing service, Mailchimp, which is also an American company, and may use similar services in the future.

8.3 We will take all reasonable steps to ensure that any overseas recipient deals with your personal information in a way that is consistent with Australia's privacy laws.

9 Direct marketing

9.1 We and our related Health Service Providers or partners may send you direct marketing communications and information about the Mappa Website, or our or their products or services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the *Spam Act 2003* (Cth) and the Privacy Act.

9.2 You may elect not to receive marketing materials from us by contacting us or using the opt-out facilities provided (e.g. an unsubscribe link).

10 Links

10.1 The Mappa Website contains links to products and services, websites, apps and embedded content owned and operated by our related Health Service Providers and other third parties that may not be governed by this Privacy Policy or the Privacy Act.

10.2 We in no way endorse those linked sites or content and are in no way responsible for the privacy practices or policies of, or any content on, those linked sites.

10.3 We recommend you review the privacy policy of each Health Service Provider and other third party site you choose to link to from the Mappa Website to determine their use of any information

or data collected from you, especially if you intend to disclose any personal information via that site.

11 Information you share

- 11.1 You may be entitled to post or upload comments, images, photos, writings or other material (“**Post/s**”) to the Mappa Website subject to the Terms. Remember, the term “Mappa Website” collectively refers to our websites, social media sites and apps. Please be aware that the information you share on the Mappa Website may become publicly available and we are unable to control or limit third party use of the Posts once you have shared them.
- 11.2 We suggest you regularly check the information you Post on the Mappa Website to ensure its accuracy. If you do not wish the information to be publicly available, please do not Post the information via the Mappa Website.

12 Security and Accuracy

- 12.1 We may hold your personal information in either electronic or hard copy form. We will take such steps as are reasonable in the circumstances to protect your personal information however held, from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative and technical measures to protect your personal information. This includes backups saved in multiple geographic locations in Australia. However, we cannot guarantee the security of your personal information.
- 12.2 We will take such steps (if any) as are reasonable in the circumstances to ensure personal information we collect, use or disclose is accurate, up-to-date and complete for the purposes for which it is collected, but make no warranties about the accuracy of personal information.

13 Access and corrections of personal information

- 13.1 You may ask us in writing to provide you with details of the personal information we hold about you. We will provide you with this information where reasonable and practical to do so, and in accordance with the Privacy Act.
- 13.2 You may request that we correct the personal information we hold about you. We will take such steps as are reasonable in the circumstances to correct your personal information as requested to ensure it is accurate, up-to-date and complete.

14 Anonymity

- 14.1 Your provision of personal information to us is optional and you are entitled to remain anonymous or provide a pseudonym, however it may be impractical for us to deal with you on an anonymous basis or through a pseudonym other than in certain circumstances (e.g. when you are providing feedback). NOTE: Users of secure areas on the Mappa Website will be required to provide personal information to login to these areas in accordance with the *Mappa Website Information Contributor Terms and Conditions*.

15 Making a complaint about breach of privacy

- 15.1 If you think we have breached the Privacy Act or you wish to make a complaint about the way we have handled your personal information, you can contact us by using the details set out in clause

16 below or via the Mappa Website. Please include your name, email address and/or phone number and clearly describe your complaint or concern. We will ensure that complaints regarding alleged breaches of privacy are investigated swiftly.

- 15.2 If you would like further information about privacy and the protection of your personal information, or if you feel we have not resolved your complaint satisfactorily, you can contact the Office of the Australian Information Commissioner at www.oaic.gov.au.

16 Contact Us

- 16.1 For further information about our Privacy Policy, or to access or correct your personal information, or to make a complaint, please contact us via the Mappa Website or contact:

Mappa Health Services Team
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