

## **PRIVACY POLICY – MOR. HEALTHCARE**

---

Last updated: 17<sup>th</sup> of December 2024

We are committed to managing your personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) (**Privacy Act**) and in accordance with other applicable privacy laws.

This document sets out our policies for managing your personal information and is referred to as our **Privacy Policy**.

We operate and maintain the [MOR Healthcare website \(https://morhealthcare.com.au/\)](https://morhealthcare.com.au/). We use your information and data to effectively provide our services and to improve the website and services. By accessing or using the website, and any of our services, you agree to the collection, use and disclosure of your Data in accordance with this Privacy Policy. If you do not provide us with the Data we request, we may not be able to provide you with the full range of our services and, depending on the Data withheld it could affect the smooth operation of our website and services. If you do not agree to abide by this Privacy Policy, we respectfully request that you refrain from using the website.

This website is not intended for children, and we do not knowingly collect data relating to children.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the information set out in the contact details paragraph 1.2 below.

### **1. Important information and identification of the data controller**

#### **1.1 Data controller**

**MOR. CARE GROUP PTY LTD** (ACN 662 693 316) operating as **MOR. HEALTHCARE** (ABN 25 662 693 316) (hereinafter referred to as “the Company,” “we,” “us,” or “our”), having its registered office at 8 BIRDWOOD CI EAGLEHAWK VIC 3556, is the data controller responsible for the processing of personal data collected through its website, services, and associated communications, in accordance with applicable privacy and data protection laws.

#### **1.2 Contact details**

Any inquiries, requests, or concerns regarding this Privacy Policy or the processing of personal data may be directed to:

(a) Email : mor@morhealthcare.com.au

### **2. About MOR. Healthcare**

We are a specialised healthcare recruitment agency dedicated to sourcing and placing healthcare

professionals across various medical and clinical specialties. The company partners with healthcare institutions, including hospitals, aged care facilities, and specialised medical centres, to provide skilled healthcare personnel tailored to client needs.

For further details about our services and affiliated entities covered under this Privacy Policy, please contact us directly.

### **3. Enhanced data security and control**

- (a) We use advanced data control technologies to safeguard your personal information. Our strict data access and control protocols include encryption, multi-factor authentication, and monitoring to ensure data integrity and security. Personal information is only accessible to authorised personnel for legitimate business purposes and is securely stored in compliance with legal standards.
- (b) Personal information collected by the Company are stored securely, with data control plugins that regularly monitor access points and usage. We store information only as long as necessary to fulfill our service commitments or as legally required. Upon the conclusion of our service engagement or upon request, we securely delete or anonymise your data in compliance with data protection regulations.
- (c) We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.
- (d) We have put in place procedures to deal with any suspected personal data breach and will notify you without any undue delay and any applicable regulator of a breach where we are legally required to do so.

### **4. Collection of personal information**

#### **4.1 Clients and prospective clients**

Upon your engagement with the Company as a client or during inquiries regarding our services, we may collect and retain personal data relevant to service provision. Such data may include, but is not limited to, identification details, contact information, employment records, medical history (where appropriate), and communications records. The scope of data collected will depend on the specific services requested and applicable legal requirements.

#### **4.2 Other Individuals**

We may also process personal data from individuals interacting with us for business or contractual purposes, including event participants, service providers, and independent contractors. Collected data may encompass names, contact details, payment information, and other relevant records. In the context of events or activities managed by the Company, images or audiovisual recordings may be



captured with appropriate consent where required by law.

#### 4.3 Website visitors

The collection, storage, and processing of personal data from website visitors are governed by our separate Website Privacy Policy, detailing cookie usage, data tracking practices, and user data management in compliance with applicable privacy laws.

#### 4.4 Sensitive medical information

We may collect sensitive medical information strictly when necessary and permissible under applicable privacy legislation. This includes, but is not limited to, vaccination records, medical assessments, work-related injury claims, and health reports essential for service provision. Such data is managed in accordance with relevant privacy laws, ensuring the highest standard of data protection and restricted access based on need-to-know principles.

### 5. **How and why MOR. Healthcare collects and uses personal information**

We collect personal information as required to conduct our healthcare recruitment and staffing operations, manage client and candidate relationships, and comply with legal and regulatory obligations. This includes assessing the suitability of job applicants, fulfilling contractual commitments, and performing related administrative functions such as billing, client communications, and service management.

#### 5.1 Purpose of data collection

The personal information we collect depends on the nature of your interaction with us and may include:

- (a) Recruitment and employment: Assessing candidates' qualifications, verifying credentials, and facilitating job placements.
- (b) Client services and support: Managing service requests, responding to inquiries, and maintaining customer records.
- (c) Administrative and legal compliance: Handling financial records, legal contracts, and responding to regulatory requests.
- (d) Service development and research: Conducting service reviews and market research to improve service quality.

#### 5.2 Methods of data collection

The Company collects personal information directly through various communication channels, including:

- (a) Direct interactions: Phone calls, emails, in-person meetings, online forms, and application portals.
- (b) Third-Party sources: Recruitment agencies, referees, regulatory authorities, and professional bodies such as the Australian Health Practitioner Regulation Agency (AHPRA) and relevant government departments, including law enforcement agencies when required by law.

### 5.3 Collection and management of medical information

- (a) For employees

Personal medical information related to employees is collected where necessary for employment, legal compliance, and workplace health and safety obligations. This includes health records such as vaccination details, medical restrictions, and occupational health assessments. Employee medical information is securely stored in personnel records, either electronically or in physical files, with access strictly limited to authorised personnel.

- (b) For clients

Medical information relating to clients is collected only when relevant to service provision, such as healthcare assessments, functional status, and medical history necessary for staffing decisions or healthcare service delivery. Client medical data is managed securely, with access restricted based on service requirements and authorised consent.

### 5.4 Use and disclosure of medical information

- (a) Permissible disclosures: Medical data may be disclosed only for legitimate purposes, including job placement, work-related health claims, and regulatory reporting. Disclosure is limited to authorised individuals such as healthcare professionals, insurers, government bodies, and relevant regulatory agencies.
- (b) Consent and authorisation: Personal medical information is disclosed only with the explicit consent of the individual, unless required by law or as part of regulatory compliance in cases involving injury claims or mandatory health reporting.

## 6. Marketing

### 6.1 Direct marketing

- (a) We may send you direct marketing communications via email, SMS, telephone, or post if you have provided your personal data to us during an inquiry, consultation, or service engagement and have not opted out of receiving such communications.
- (b) We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which product, services and offers may be of interest to you so that we can then send you relevant marketing communications.

## 6.2 Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

## 6.3 Opting out of marketing

- (a) You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us at [mor@morhealthcare.com.au](mailto:mor@morhealthcare.com.au)
- (b) If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to order confirmations for a service warranty registration, appointment reminders, updates to our Terms and Conditions, checking that your contact details are correct.

## 7. How do we interact with you via the internet

- (a) You may visit our website (<https://morhealthcare.com.au/>) without identifying yourself. If you identify yourself (for example, by providing your contact details in an inquiry), any personal information you provide to us will be managed in accordance with this Privacy Policy.
- (b) Our website uses cookies. A “cookie” is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our website and on third-party websites. You are not identifiable from such information.
- (c) You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.
- (d) Our website may contain links to third-party websites. We are not responsible for the content or privacy practices of third-party websites that are linked to our website.

## 8. International transfers

- (a) We are an Australian based organisation. However, since we function at a global level and work with clients, service providers, sponsors and commercial interests across the globe, it is likely that your personal information will be disclosed to overseas recipients.
- (b) Unless we have your consent, or an exception under the APPs applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your personal information.

## 9. Data retention

9.1 How long will you use my personal data for?

- (a) We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- (b) To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- (c) By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 3 years after they cease being customers for tax purposes.
- (d) In some circumstances you can ask us to delete your data: see paragraph 10 below for further information.
- (e) In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

**10. Your legal rights**

10.1 You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- (a) Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- (d) Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- (e) You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 6 for details of how to object to receiving direct marketing communications).
- (f) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) [Withdraw consent at any time where we are relying on consent to process your personal data (see paragraph 5.4(b) for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.]
- (h) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - (i) If you want us to establish the data's accuracy;
  - (ii) Where our use of the data is unlawful but you do not want us to erase it;
  - (iii) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - (iv) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, [please contact us [see Contact details paragraph 1.2

## 10.2 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## 10.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### 10.4 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### 11. Submission of complaints about the handling of your personal information

- (a) You may contact us at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.
- (b) You may make a complaint about privacy to the Privacy Officer at the contact details set out below.
- (c) The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.
- (d) If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.
- (e) In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.
- (f) If you are not satisfied with our response to your complaint, or you consider that [name of APP entity] may have breached the APPs or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner (**OAIC**). The OAIC can be contacted by details provided below or by using the contact details on the OAIC website.

Office of the Australian Information Commissioner:

- (i) Phone : 1300 363 992
- (ii) Teletypewriter (TTY) : 133 677 then ask for 1300 363 992.
- (iii) Speak and Listen users : 1300 555 727 then ask for 1300 363 992



- (g) Where the complaint relates to a registered Health Practitioner, privacy complaints may also be lodged with that body by contacting the following office:

National Health Practitioners Privacy Commissioner:

(i) Phone: 03 9674 0421

(ii) Email : [complaints@nhpopc.com.au](mailto:complaints@nhpopc.com.au)

## **12. Changes made to this privacy policy**

We may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes.