



PRIVACY POLICY

Approved by

Des Headland - CEO

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Spartan First Pty Ltd

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PURPOSE

Spartan First Pty Ltd (ABN: 62 629 785 682 / ACN: 629 785 682) is committed to the protection of information that we hold about individuals. We are bound by the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) (Privacy Act) and other applicable laws.

This Privacy Policy covers our treatment of personal information that we collect, use, disclosure and security, including information we collect via our website and as part of delivery of our services.

We may update this Privacy Policy from time to time. The most current version of our Privacy Policy will be located on our website and is also available by contacting our Privacy Officer by email or at the address detailed below.

By using our website www.spartanfirst.com.au or by providing any personal information to us, you consent to the collection, use, disclosure and security of your personal information as set out in this Privacy Policy.

CONSENT

Spartan First is committed to ensuring that any personal information we collect is obtained lawfully and with your consent, whenever it is practical for us to do so.

When you provide your personal information, you consent to us collecting, using and disclosing your personal information as described in this Privacy Policy.

Responsible persons (e.g., a spouse or partner, close family member, emergency contact or enduring medical power of attorney) may be required to provide your information and/or consent on your behalf where it is not reasonable or practical for us to collect this information directly from you.

TYPES OF PERSONAL INFORMATION COLLECTED

As part of our Business, we may collect information when it is reasonably necessary for any of our functions or activities. The types of personal information that we collect, and hold will vary depending on your dealings with us. This information may include any or all of the following:

- Name, date of birth, and contact details (address, phone number, email).
- Medical history, including current conditions and medications.
- Health insurance details.
- Medicare number.
- Billing and payment information.
- Any other information relevant to your healthcare.

USE OF PERSONAL INFORMATION

We use your personal information for the following purposes:

- Providing medical care and treatment.
- Managing appointments and follow-ups.
- Billing and processing payments.

- Communicating with you regarding your healthcare.
- Providing your employer with applicable health information relating to your employment conditions e.g., in the case of injury management, health surveillance and/or pre-employment medical services.
- Administering health insurance claims.
- Meeting legal and regulatory requirements.
- Improving our services and conducting research (anonymized data only).

From time to time, you may provide us, and we may collect from you, personal information of a third party (for example, for delivery purposes). Where you provide the personal information of a third party, it is your responsibility to ensure that those persons are aware of this Privacy Policy, understand it and agree to accept it.

You do not have to provide us with any personal information, however, if you do not do so we may not be able to provide you with the products or services you have requested.

DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information to third parties in the following circumstances:

- To other healthcare providers involved in your treatment and care.
- With your consent, to family members or nominated representatives and/or employers (in the case of injury management, health surveillance and/or pre-employment medical services).
- To health insurance providers and Medicare for claims and billing.
- When required by law or court order.
- In emergency situations to protect your vital interests.
- In the course of medical research (anonymized data only).

SECURITY OF PERSONAL INFORMATION

We take appropriate measures to protect the security of your personal information, including:

- Storing physical records in secure locations.
- Implementing electronic security measures to safeguard digital information.
- Restricting access to personal information to authorized personnel.
- Regularly reviewing and updating our security practices.

HOW WE COLLECT PERSONAL INFORMATION

Generally, we collect personal information directly from you, such as:

- When you submit information through our website.
- In person.
- In the course of us providing you with a requested product or service.
- When you apply for a credit account with us.
- When you reply to a survey or promotion that we run.
- When you have other dealings with us.

We collect personal information through third parties who supply products and services or refer customers to us.

WHY WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

We will use the personal information we collect for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy. We will not use your personal information for any other purpose without first seeking your consent, or where authorized or required by law.

We will collect personal information for the following purposes:

- To provide services through or in connection with Spartan First.
- To establish and maintain your relationship with us.
- To provide products or services you have requested from us.
- To answer any inquiry you make.
- To provide credit to you.
- To make our products and/or services more valuable or useful.

We may also disclose your personal information to third parties (in accordance with the Privacy Act only) who work with us in our Business to provide, promote or improve the products or services you have requested or are interested in, such as:

- Hosting services.
- Email services.
- Analytics services.
- Service providers engaged by us in connection with Spartan First.
- Consultants and professional advisers.

We may use your information to provide and market our products and/or services to you (including by direct marketing) and to enhance and develop our relationship with you. We may also use your information to keep you informed of our products, events and other matters including by email or other electronic means.

If you do not wish to be contacted for these purposes, please let us know by contacting the Privacy Officer at our office or opting out of receiving this marketing through the unsubscribe function that will be made available to you with each communication.

INFORMATION YOU GIVE US ABOUT OTHER PEOPLE

If you provide us with personal information about someone else you must ensure that you are entitled to do so and that we may collect, use and disclose that information in the manner set out in this Privacy Policy without further action by us. In particular, you agree to inform that person who we are, that we will use and disclose their personal information as outlined in this Privacy Policy from time to time, that they may gain access to that information as outlined in this Privacy Policy and the consequences if the information is not provided (such as our inability to provide products or services to you or them).

COOKIES

Our website use cookies and pixels to track user traffic patterns and to better serve you when you revisit a website. A cookie is a small data file that a website may write to your hard drive when you visit it. A cookie file can contain information, such as a user ID which the website uses to track the pages you have visited. You can refuse all cookies by turning them off in your browser. However, full functionality for our website requires the use of cookies.

Information is also generated whenever a page is accessed on our website that records information such as the time, date and specific page. We collect such information for statistical and maintenance purposes that enables us to continually evaluate our website performance.

HOW YOU CAN ACCESS YOUR PERSONAL INFORMATION

You have the right to access the personal information we hold about you and request corrections if necessary. If you would like to access or correct your information, please contact our Privacy Officer using the contact details provided below.

We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date. If your personal details change, such as your address or phone number, please contact our Privacy Officer by email or at the address detailed below.

At your request, we will provide you with a copy of any personal information which we hold about you, unless an exception under the Privacy Act applies.

We will promptly acknowledge and investigate any complaint about the way we manage personal information.

COMPLAINTS AND CONTACT

If you have any concerns about how we handle your personal information or believe there has been a breach of the Australian Privacy Principles, please contact our Privacy Officer:

Attention: Privacy Officer

Address: 1/54 Kewdale Road, Welshpool, Kewdale WA 6016

Phone: 1300 989 094

Email: privacy@spartanfirst.com.au

We take privacy matters seriously and will respond to your complaint as soon as possible.

If you are not satisfied with the outcome or management of your complaint, you can contact the Office of Australian Information Commissioner (OAIC) via www.oaic.gov.au/privacy/privacy-complaints

CHANGES TO THE PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The latest version of our Privacy Policy will always be available on our website.

By engaging with our services, you consent to the collection, use, and disclosure of your personal information as described in this Privacy Policy.