

Cub Care

Privacy Policy

1 Introduction

At Cub Care, we are committed to the privacy and security of any personally identifiable information provided to us by our users. Personally identifiable information is any information that can be linked to a specific individual (eg. name, phone numbers, email).

This privacy policy explains how we handle and protect your personally identifiable information. We do this in accordance with the *Privacy Act 1988* (Cth) (**Act**).

We reserve the right to modify or amend this policy at any time and for any reason. Any material changes to this privacy policy will be posted prior to their implementation. Questions regarding this policy should be submitted via email to admin@cubcare.com.au.

2 With whom do we share your information?

Other than as set out below, we do not disclose information to anyone except the relevant Practitioner, Client (if different from the Patient) and Patient, as well as any of our staff and contractors who need that information in order to provide or facilitate the provision of our services to you.

We may be required by law to disclose information you provide us with for the purposes of obtaining products or services, in which case we only disclose information to the extent we are required to disclose it and only to those to whom we are required to disclose it, or if necessary to our legal advisors for the purposes of obtaining legal advice. We may also disclose information about someone whose activities could cause harm to others (for example, fraud).

Other than in the circumstances outlined above or as otherwise specifically permitted under the Act, the information you supply to us remains stored confidentially on our secure servers and is not shared with third parties.

3 What information do we collect?

3.1 Client or Patient

If you are a Client or Patient, then at or before consultation we may record information such as your:

- (a) Name
- (b) Contact details such as street and/or postal address and relevant telephone numbers
- (c) Date of birth
- (d) Place of birth and ethnic background
- (e) Employment details
- (f) Health fund membership details
- (g) Medicare, Veterans Affairs and any related government identifier numbers

If you are a Patient, we may also record other information provided to us by your or other medical practitioners such as your:

- (h) medical records and any relevant referral records
- (i) medical history, current treatments and any other information reasonably necessary to assist the treating practitioner to provide clinical services to the Patient
- (j) family medical history

We will collect and record any other information the Client or the Patient provides to us while using our services

We do store medical notes or other information created by the treating practitioner using our software.

We note that the disclosure of specific information remains the prerogative of the Client and Patient. However, if you do not provide us with personal information we request or require, we may not be able to provide certain (or any) services to you nor allow you to take part in provision of any such services. If you are a Patient, failing to provide us with all relevant information may result in our advice and recommendations (including as to your treatment, diagnosis, prognosis and other relevant matters) being incomplete or incorrect.

4 How do we collect your personal information?

4.1 Directly from You

We will collect personal information directly from you during the course of your consultation.

If you consent to the recording of the audio from your video consultation, the audio will be encrypted and stored. Transcripts and summaries of the audio may also be generated and stored.

4.2 Cookies

Cookies (or something similar) are required for a website such as Cub Care to ensure the website can remember information required about a Patient and Client throughout their Cub Care visit.

We only use cookies belonging to our site and do not share these with anyone else. We do not use any third party cookies that enable tracking (such as Facebook) which track information outside of our website.

We collect your personal information directly from you unless it is unreasonable or impracticable to do so.

Our methods of collection may include:

- collecting data you have written or entered into our registration, data collection, client or patient information forms
- making a record of data disclosed by you during the course of a consultation or other communications with us or practitioners we engaged to provide clinical services to you

4.3 From third parties

We may also collect personal information from third parties including:

- (a) information provided on your behalf with your consent;
from any person who has referred you to us or to whom you are referred.

5 How do we store your personal information?

5.1 Cookies

As described above we do use Cookies to store information about your visit. We do not share this information with any 3rd party and do not use 3rd party cookies.

5.2 Practitioner recording and viewing

We do provide facilities for Practitioners using the system to both record and view medical notes.

5.3 Technical matters

Cub Care stores all data you provide in an Australian Signals Directorate (ASD) certified cloud service provider (Amazon Web Services). All data is encrypted during transmission using the Secure Sockets Layer (SSL) protocol.

If you do not consent to audio recording, your personally identifiable data, including names, contact details, chat logs and photos do not leave Australia. It is encrypted at rest in an AWS Sydney data server.

Video data is transmitted with end-to-end encryption such that it is impossible for anyone but the participants of the call to see the video in real-time. The video is not recorded.

If you do consent to the recording of the audio from your video consultation, the audio will be encrypted and stored in Amazon Web Services' Australian data centres. The audio and other supporting information may be transmitted and temporarily stored in Microsoft Azure's Australian and United States data centres, and Amazon Web Services' United States data centres for the purposes of transcription and analysis by machine learning algorithms. This improves the redundancy, quality and safety of our audio transcription and clinical note taking systems. Amazon Web Services and Microsoft Azure are world leaders in cloud computing technology and have best in class security and privacy that are consistent globally. Further information can be found for [Amazon here](#) and [Microsoft here](#). We always prefer to keep your data in Australia. It is only when the safest and most advanced machine learning models are not available in Australia that we fall back to United States data centers. All of these data will be encrypted during transit and at rest. Your data will not be shared with or used by any other parties. Microsoft and Amazon assert that your data will not be used for training their ML models.

We record event logs about how you are using the website and the Service, including the following information:

- (a) Page views
- (b) Interactions with forms
- (c) All actions during a consultation (eg. text message sent and received, video called started and stopped etc.)

We utilize text messages that are sent over the cellular network from ClickSend or Amazon Web Service - Sydney Server.

We also utilise email and Medical Objects and other Australian Healthcare secure messaging services for some correspondence.

6 Why do we collect and how do we use your personal information?

6.1 Primary purposes

We use your personally identifiable information for the primary purposes of providing our services and communicating with you in relation to our services.

More specifically, these purposes may include:

- (a) to provide clinical and related services to the Patient and facilitate provision of clinical services by Practitioners
- (b) to provide non-clinical services to Clients (where they are not the Patient) relevant to the clinical services provided to the relevant Patients
- (c) administrative and billing purposes
- (d) compliance with legal obligations

6.2 Secondary purposes

We may use your personally identifiable information for secondary purposes including:

- (a) internal clinical review
- (b) internal training
- (c) improvement of all or any part of our services
- (d) internal data research and analysis
- (e) direct marketing communications with you (not with a third party)
- (f) provision to our contractors for any of the purposes referred to at (a) to (e) above
- (g) for the purposed of obtaining legal advice or exercising or protecting our legal rights and/or those of our staff and/or contractors

7 How can you find out more details about what information is being held?

If at any time you want to inquire about any of the personally identifiable information that we store, request any data to be deleted or to request any amendment or correction to that information, please contact: admin@cubcare.com.au

8 Accessing and correcting your personal information

Under the Act, you have the right to ask for access to personal information that we hold about you, and ask that we correct that personal information.

You can ask for access or correction by contacting us and we must respond within 30 days. If you ask, we must give you access to your personal information, and take reasonable steps to correct it if we consider it is incorrect, unless there is a law that allows or requires us not to.

We will ask you to verify your identity before we give you access to your information or correct it, and we will try to make the process as simple as possible. If we refuse to give you access to, or correct, your personal information, we must notify you in writing setting out the reasons.

If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We must do so unless there is a valid reason not to.

If we refuse to correct your personal information, you can ask us to associate with it (for example, attach or link) a statement that you believe the information is incorrect and why.

9 **How to make a complaint**

If you wish to complain to us about how we have handled your personal information you should complain in writing. If you need help lodging a complaint, you can contact us.

If we receive a complaint from you about how we have handled your personal information we will determine what (if any) action we should take to resolve the complaint.

We will tell you promptly that we have received your complaint and then respond to the complaint within 30 days.

If you are not satisfied with our response you can contact the [Office of the Australian Information Commissioner](#).

10 **How do we protect your information?**

To ensure the confidentiality of your personally identifiable information, we use industry standard security technology and procedures.

Data is encrypted when being transmitted from your device to our server and when stored in our database. Cub Care uses Australian Signals Directorate / Australian Cyber Security Centre approved Cloud Computing services through Amazon Web Services:

<https://www.cyber.gov.au/news/aws-ccsl>

<https://www.cyber.gov.au/irap/cloud-services>

If you do not consent to audio recording, your personally identifiable data, including names, contact details, chat logs and photos do not leave Australia. It is encrypted at rest in an AWS Sydney data server.

Video data is transmitted with end-to-end encryption such that it is impossible for anyone but the participants of the call to see the video in real-time. The video is not recorded. In most cases, the video data will flow directly between the call participants. If the participants cannot connect directly, video data will be routed to each participant through the Australian data centre of one of our cloud service providers - either Amazon Web Services or Twilio. In the case of Twilio, some anonymous information is transmitted to the USA to help the two call participants to connect. This only includes network information used for call connection - it does not include the video data or any of your personal information. In the extremely rare event that Twilio has an Australia-wide outage, your encrypted video data may be routed to the other call participants via a server outside Australia. However, this data cannot be viewed by anyone but the call participants, and is not recorded.

If you consent to the recording of the audio from your video consultation, the audio and any resulting analysis or transcript will be encrypted during transit and at rest. Your call-related data is primarily stored in Australia, and access is strictly limited to authorized Cub Care personnel. Call audio and other supporting information may temporarily leave Australia via secure transmission to Microsoft or Amazon United States data centres to facilitate analysis by machine learning algorithms. We always prefer to keep your data in Australia. It is only when the safest and most advanced machine learning models are not available in Australia that we fall back to United States data centers.

When you send personally identifiable information to us over the Internet, your data is protected by state of the art Secure Socket Layer (SSL) technology. This is the same technology used to secure Internet Banking transactions.