



# Customer privacy and complaints policy

Version: 5

October 2025

# Contents

1	Context .....	4
2	This Policy.....	4
2.1	Scope of this Privacy Policy .....	4
3	The Information we collect.....	5
4	Why we collect Personal Information.....	5
5	How Information is collected.....	6
5.1	Usage data .....	6
5.2	Device data .....	6
5.3	Information from page tags .....	6
6	When Personal Information is used and disclosed.....	6
7	Sensitive Information.....	7
8	Opting 'In' or 'Out' .....	8
9	Cookies.....	8
10	The safety and security of Personal Information .....	8
11	How to access and/or update Information.....	9
12	Right to be forgotten .....	9
13	Privacy complaints and disputes .....	10
14	Additions to this Policy .....	10

## Document version

Version	Date	Author	Notes
4	June 2021	SP	First release for Roster 'V2' and Connect
5	Oct. 2025	CL	Updated to remove Connect and reviewed for currency

## 1 Context

HOSPORTAL PTY LTD ACN 152 359 843 (**HosPortal**, we, us or our) owns and operates the website hosportal.com, including various sub-domains operating HosPortal's rostering software (**Roster**), notably app.hosportal.com and mirror.hosportal.com.

Roster customers are the hospitals and health facilities that need to roster their staff and provide relevant contact details for other hospital employees to contact relevant health providers, potentially in the event of a medical emergency. The names and contact information is provided and maintained by HosPortal's customers as a necessary part of the operation of the software.

## 2 This Policy

This Policy governs how HosPortal deals with your Personal Information including medical information collected in connection with the Services and your use of the Website. This Policy applies to anyone using the Website or Services (**you**).

This Policy also applies to Personal Information collected by HosPortal in connection with its website, SMS message services, applications, software and other technological means (Online Platforms).

By continuing to use the Online Platforms and the Services, you consent to HosPortal Connect using your Personal Information in accordance with this policy.

### 2.1 Scope of this Privacy Policy

We understand that when accessing our Services, the privacy and confidentiality of Personal Information (as defined under the Privacy Act) is important to you. That's why we fully respect your rights to privacy and are committed to protecting the personal and financial details you provide us in line with this Privacy Policy. This Privacy Policy applies to our Services and all individuals who use our Services and web-site.

We are committed to protecting the privacy of everyone who uses our Services, for them to understand what Personal Information we collect and store, and why we do so, how we receive and/or obtain that information, the rights an individual has with respect to their Personal Information in our possession, and with complying with the Australian Privacy Principles set out in the Privacy Act when they apply to us.

### 3 The Information we collect

To enable HosPortal to provide the Services, we may collect, on behalf of our customers, the following types of Personal Information from you.

- Users' email, contact phone numbers

Customers may configure HosPortal to allow their administrators and their users to enter additional information, such as qualifications and interests, and may permit users to upload documents, such as in PDF and Excel format. HosPortal does not specify the nature of this information, does not collect it on behalf of its customer, and HosPortal requires under its contract that its customers do not collect or keep information that might be classified as 'sensitive' under Australian privacy law.

Under the Roster contract it is important to note that HosPortal is a tool for capturing user contact information. This information is collected and provided by the customer, typically from its employees and contractors, and entered into HosPortal. As a consequence the responsibility for seeking consent for the information to be entered into HosPortal lies with each customer.

Roster users can at all times review their personal information and in many cases delete it. In all cases users can ask roster administrators at each customer to delete it. There is some information, such as email addresses, that if a user or customer delete it, it means that the user cannot access HosPortal and it may affect a roster administrator's ability to staff that user on clinical duties.

In instances where we become aware that we have received information that were not solicited by us or subscribers who use our Services, we will, but only if it is lawful, destroy the information.

We may collect financial information such as any bank or credit card details used to transact with us and other information that allows us to transact with the individual and/or provide them with our services.

### 4 Why we collect Personal Information

We collect your Personal Information so that we can carry out the following actions:

- to provide our Services;
- to communicate with you, including about our Services;
- to provide you with information;
- to provide your Personal Information to third parties including your health professional to enable them to provide their services to you;
- to consider and respond to complaints made by you.

We may disclose additional purposes for collection of your Personal Information in collection statements at the point of collection.

## 5 How Information is collected

Information is collected in association with an individual's use of the Services, an enquiry about HosPortal or generally dealing with us.

### 5.1 Usage data

We collect usage data about you whenever you interact with our services. This may include which webpages you visit, what you click on, when you performed those actions, and so on. Additionally, as with most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, and timestamps.

### 5.2 Device data

We collect data from the device and application you use to access our services, such as your IP address, operating system version, device type, system and performance information, and browser type. We may also infer your geographic location based on your IP address. Your IP address will be linked to your survey responses unless a survey creator has disabled IP address collection for the survey you respond to.

### 5.3 Information from page tags

We may use third party tracking services that employ cookies and page tags (also known as web beacons) to collect aggregated and anonymized data about visitors to our websites. This data includes usage and user statistics.

## 6 When Personal Information is used and disclosed

We will not use any Personal Information other than for the purpose for which it was collected other than with the individual's permission or, in the case of Roster, where the information has been entered by a customer in accordance with their privacy provisions.

We will retain Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

We will not disclose or sell an individual's Personal Information to unrelated third parties under any circumstances.

We will not disclose or store Personal information overseas, although email and SMS transmissions may be routed via reputable overseas services using reputable data storage providers where the data is encrypted in transport and at rest.

Information is also used to enable us to operate our business, especially as it relates to an individual. This may include:

- Verifying an individual's identity;
- Communicating with an individual about:
  - Their relationship with us;
  - Our Services;
  - Our own marketing and promotions to customers and prospects;
  - Competitions, surveys and questionnaires;
  - Investigating any complaints about or made by an individual, or if we have reason to suspect that an individual is in breach of any of our terms and conditions or that an individual is or has been otherwise engaged in any unlawful activity.

There are some circumstances in which we must disclose an individual's information:

- Where we reasonably believe that an individual may be engaged in fraudulent, deceptive or unlawful activity that a governmental authority needs to be made aware of;
- As required by any law (including the Privacy Act); and/or
- In order to sell our business (in that we may need to transfer Personal Information to a new owner).

## 7 Sensitive Information

Sensitive information is information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a professional or trade association, membership of a trade union, details of health, disability, sexual orientation or criminal record.

It is our policy to only collect your sensitive information where it is reasonably necessary for our functions or activities and either you have consented or we are required or authorised under law to do so.

Roster does not collect and store sensitive information, but other unrelated services and products developed and offered by HosPortal may. We keep such data separate.

## 8 Opting 'In' or 'Out'

By clicking "I Agree" or any other button indicating your acceptance of this privacy policy, you expressly consent to the collection and use of your Personal Information in accordance with this privacy policy.

An individual may opt to not have us collect their Personal Information. This may prevent us from offering them some or all of our services and may terminate their access to some or all of the services they access with or through us. They will be aware of this when the Privacy Principles apply to us:

- **Opt In.** Where the individual will have the right to choose to have information collected and/or receive information from us; or
- **Opt Out.** Where relevant, the individual will have the right to choose to exclude himself or herself from some or all collection of information and/or receiving information from us.

If an individual believes that they have received information from us that they did not opt in or out to receive, they should contact us on the details below.

## 9 Cookies

We may use temporary (session) cookies or permanent cookies when you access our Online Platforms and/or Services. This allows us to recognise your browser and track the web pages you have visited. You can switch off cookies by adjusting the settings on your web browser.

## 10 The safety and security of Personal Information

We will take all reasonable precautions to protect an individual's Personal Information from unauthorised access. This includes appropriately securing our physical facilities and electronic networks.

We hold your data securely. We will not disclose an individual's Personal Information to any entity outside of Australia that is in a jurisdiction that does not have a similar regime to the Australian Privacy Principles or an implemented and enforceable privacy policy similar to this Privacy Policy. We will take reasonable steps to ensure that any disclosure to an entity outside of Australia will not be made until that entity has agreed in writing with us to safeguard Personal Information as we do.

HosPortal uses encryption to store and transfer Personal Information. Despite this, the security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. Each individual that provides information to us via the Internet or by other means does so at their own risk. We cannot accept responsibility for



misuse or loss of, or unauthorised access to, Personal Information where the security of information is not within our control.

We are not responsible for the privacy or security practices of any third party (including third parties that we are permitted to disclose an individual's Personal Information to in accordance with this policy or any applicable laws). The collection and use of an individual's information by such third parties may be subject to separate privacy and security policies.

If an individual suspect any misuse or loss of, or unauthorised access to, their Personal Information, they should let us know immediately.

Similarly, where we become aware of any breach to our security systems that is likely to result in a breach of your rights or freedoms with respect to your Personal Information we will notify you. In the event of an 'eligible data breach' that is likely to result in serious harm to individuals to whom the information relates we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as required by the Notifiable Data Breach (NDB) scheme.

We are not liable for any loss, damage or claim arising out of another person's use of the Personal Information where we were authorised to provide that person with the Personal Information.

## 11 How to access and/or update Information

Account holders of the Services can update their Personal Information from within their HosPortal account.

Roster users can update their own personal information in Roster.

Subject to the Australian Privacy Principles, an individual has the right to request their Personal Information that we have about them, with an obligation to provide with such information within 28 days of receiving their written request. Individuals should contact their health professional or the administrator of their Roster account with such request.

## 12 Right to be forgotten

In the event that you decide that you no longer want us to hold your Personal Information, you may contact your your employer or Roster administrator of your desire to delete your Personal Information on record. They will be able to delete your Personal Information from within their account.

If you are unsatisfied with the outcome after contacting your relevant contact, we can perform this function only where we can positively identify you as being the owner of the Personal Information.

## 13 Privacy complaints and disputes

If an individual need to contact us or has a complaint about our handling of their Personal Information, they should address their communication in writing to the details below:

Privacy Officer  
HosPortal Pty Ltd  
PO Box 690  
Woollahra NSW 1350  
Email: [webadmin@hosportal.com](mailto:webadmin@hosportal.com)

If we have a dispute regarding an individual's Personal Information, we both must first attempt to resolve the issue directly between us. We will respond in writing to your complaint within 30 days of receiving your complaint.

If we become aware of any unauthorised access to an individual's Personal Information we will inform them at the earliest practical opportunity once we have established what was accessed and how it was accessed.

If you are dissatisfied with the response you receive you can contact the OAIC. Further information about making privacy complaints through the OAIC can be found by visiting <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

## 14 Additions to this Policy

We may modify this privacy policy at any time, but if we do so, we will notify you by publishing the changes on this website. If we determine the changes are material, we will provide you with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you.

If, after being informed of the changes, you continue to use our services beyond the advance-notice period, you will be considered as having expressly consented to the changes in our privacy policy. If you disagree with the terms of this privacy policy or any updated privacy policy, you may close your account (if you have one) at any time or not respond to a survey.