

# Umps Health Privacy Policy

Version date: May 21, 2020

## 1. Introduction

Umps Health Pty Ltd ACN 61 635 0611 (“we”, “our” and “us”) is committed to responsible privacy practices and to complying with the Privacy Principles contained in the Privacy Act 1988 (Cth) (“Privacy Act”) to the extent they apply to us.

This Privacy Policy sets out our policies on the management of personal information including how we collect personal information, the purposes for which we use this information, and to whom this information is disclosed. We may change or update our Privacy Policy from time to time. At any time, the latest version of our Privacy Policy is available from our website at [www.umpshealth.com](http://www.umpshealth.com).

## 2. What is personal information?

In this Privacy Policy, “personal information” has the meaning set out in the Privacy Act. Essentially, personal information is information or an opinion about an individual who is reasonably identifiable.

## 3. What types of personal information do we collect?

When you register for Umps, we may collect contact details including your name, address, email address, phone numbers and your date of birth / age.

When you interact with the Umps Smart Home, we collect information about your home, the electrical devices within your home and the way you interact with specific electrical devices in the home.

We do not generally require you to disclose any sensitive information to us, but if you do you consent to us collecting, using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the Privacy Act and other relevant laws.

In addition to the types of personal information identified above, we may collect personal information as otherwise permitted or required by law.

## **4. How do we collect your personal information?**

We collect personal information in several ways. The most common ways we collect your personal information are:

- Directly from you when you provide information to us upon registration for our service or during the course of service delivery;
- From a Care Provider delivering care services to you;
- From your Nominated Contacts, particularly when we raise an alert to them.

Where possible, we will collect information directly from you unless it is unreasonable or impracticable for us to do so.

## **5. For what purposes do we collect, use and disclose your personal information?**

The primary reason we collect, use and disclose your personal information is so that we can provide you with the Umps Health Smart Home Service. We may also use or disclose your personal information for other purposes to which you have consented or as otherwise authorised or required by law.

Whenever practical we endeavour to inform you why we are collecting your personal information, how we intend to use that information and to whom we intend to disclose it at the time we collect your personal information.

Some of the specific purposes for which we collect, use and disclose personal information are:

- to provide the Umps Health Smart Home Service to you, including disclosing personal information to your Nominated Contacts or a Care Provider via SMS alerts and the Umps Health App;
- to improve the Umps Health Smart Home Service;
- to respond to you if you have requested information;
- to address any issues or complaints that we or you have regarding our the Umps Health Smart Home Service; and
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

We may anonymise and aggregate any of the personal information we hold (so that it does not directly identify you). We may use anonymised and aggregated information for additional purposes, including to test our IT systems, conduct research, for data analysis, to improve our website, apps and products and develop new products and services.

We do not disclose personal information to anyone else except as set out above. We may provide third parties with aggregate statistical information and analytics

about users of our products and services, but we make sure no one can be identified from this information before we disclose it.

## 6. Direct marketing

Direct marketing involves communicating directly with you for the purpose of promoting goods or services to you and to provide you with special offers. Direct marketing can be delivered by a range of methods including mail, telephone, email or SMS. You can unsubscribe from our direct marketing, or change your contact preferences, by contacting us (see **section 16** of this Privacy Policy).

## 7. What happens if you don't provide personal information?

Generally, you have no obligation to provide to us any personal information requested by us. However, if you choose to withhold requested personal information, we may not be able to do provide you with the Umps Health Smart Home or allow you to participate in any activities that depend on the collection of that information.

## 8. To whom do we disclose personal information?

We may disclose your personal information to third parties in connection with the purposes described in **section 5** of this Privacy Policy. This may include disclosing your personal information to the following types of third parties:

- our employees and related bodies corporate;
- a third-party Monitoring Service Provider, if you are receiving Monitoring Services from Umps;
- a Care Provider delivering care services to you;
- our contractors and other third parties that provide goods and services to us (including website and data hosting providers, and other suppliers);
- our accountants, insurers, lawyers, auditors and other professional advisers and agents;
- payment system operators;
- any third parties to whom you have directed or permitted us to disclose your personal information (e.g. an aged care provider);
- in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors;
- third parties that require the information for law enforcement or to prevent a serious threat to public safety; and
- otherwise as permitted or required by law.

Where we disclose your personal information to third parties we will use reasonable efforts to ensure that such third parties only use your personal

information as reasonably required for the purpose we disclosed it to them and in a manner consistent with the Privacy Principles under the Privacy Act.

If you post information to public parts of our websites or to our social media pages, you acknowledge that such information (including your personal information) may be available to be viewed by the public.

## 9. Does personal information leave Australia?

We do not generally disclose your personal information outside of Australia. Except in some cases where we may rely on an exception under the Privacy Act, if we do disclose personal information to overseas recipients, we will take reasonable steps to ensure that such overseas recipients do not breach the Privacy Principles in the Privacy Act in relation to such information.

If you are receiving Monitoring Services from Umps, your data will be provided to a third-party Monitoring Service Provider for the purposes of delivering this service to you. The Monitoring Service Provider may store a copy of your client record in New Zealand for the purposes of providing continued service in the event of an emergency at the Australian response centre.

## 10. How do we protect personal information?

We take reasonable steps to keep any personal information we hold about you secure. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth).

Please notify us immediately if you become aware of any breach of security.

## 11. How long we keep personal information

We will keep your personal information for as long as you have an account with us. After you close your account with us we will keep your personal information for a reasonable period to maintain our records and legal obligations to you. This is typically a period no longer than 12 months.

## 12. Accuracy of the personal information we hold

We rely on the accuracy of personal information to deliver Our services, and try to maintain your personal information as accurately as reasonably possible.

We encourage you to contact us if the personal information we hold about you is incorrect or to notify us of a change in your personal information. Our contact details are set out in **section 16** of this Privacy Policy.

### **13. Links, cookies and use of our websites and applications**

Our website may contain links to other sites. This Privacy Policy applies to our website and not any linked sites which are not operated or controlled by us.

We may use “cookies” and similar technology on our websites and in other technology applications. The use of such technologies helps to monitor the effectiveness of advertising and how visitors use our websites/applications. We may use such technologies to generate statistics, measure your activity, improve the usefulness of our websites/applications and to enhance the “customer” experience.

If you prefer not to receive cookies you can adjust your Internet browser to refuse cookies or to warn you when cookies are being used.

### **14. How can you access and correct personal information we hold about you?**

You may seek access to personal information which we hold about you by contacting us as described in **section 16** of this Privacy Policy. We may require that the person requesting access provide suitable identification.

If you become aware that any personal information we hold about you is incorrect or if you wish to update your information, please contact us (see **section 16** of this Privacy Policy).

### **15. Queries, comments and complaints about our handling of personal information**

If you have any questions, comments or complaints about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Privacy Act, please contact us (see **section 16** of this Privacy Policy).

We take any privacy complaint seriously and any complaint will be assessed with the aim of resolving the issue in a timely manner. If you are not satisfied with the outcome of our assessment of your complaint, you may wish to contact the Office of the Australian Information Commissioner.

### **16. 16 How can you contact us?**

Please address all privacy questions, comments or complaints to:

By phone: 1300 907 272

By mail:

ATTN: Umps Health  
Level 1, 333 Exhibition St  
Melbourne VIC 3000  
By email: [info@umpshealth.com](mailto:info@umpshealth.com)

If you wish to seek access to or correct or update any personal information we hold about you, or to unsubscribe from our direct marketing you can also contact us using the contact details listed above.