

Privacy and Metadata Policy

POLICY NUMBER:	POL-004	VERSION:	0.4
AUTHORISED BY:	Massimo Raballo	AUTHORISED DATE:	24/05/18
ISSUED BY:	Dario Vanin – IT Enabler	EFFECTIVE DATE:	24/05/18
CATEGORY:	Information and Communication	REVIEW DATE:	
SOA REF. #	A18.1.4 Privacy and protection of personally identifiable information		

Policy Statement

TheScreeningLab Pty Ltd (TheScreeningLab, TSL, we or us) is committed to protecting the privacy of your personal information including Metadata is defined as the data providing information about one or more aspects of the data and used to summarize basic information about data. We take our responsibility for handling sensitive personal information seriously and we have put measures in place to maintain the integrity of personal information and provide full transparency on conduct. We are bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) about how we handle your personal information.

Scope

This policy applies to:

- All officers, contractors, consultants and outsourced service providers performing work for TSL
- All ICT systems that store TSL information, wherever they are located.

Objectives

This Privacy Policy sets out how and why TheScreeningLab collects, stores, uses and discloses your personal information, how analyses and discloses metadata derived by de-identified personal records, and how to contact us if you have any questions about how we handle your personal information or would like to access the personal information we hold about you.

We are constantly evolving our services, and new services may be offered from time to time.

Roles and responsibilities

1. Executives within TSL are responsible for:
 - Ensuring that TSL processes are conducted in accordance with this policy.
 - Administering and updating this policy.
2. ICT Service Providers are responsible for:



- Developing, enforcing and monitoring procedures within their environments in accordance with this policy.
 - Promoting good password practice.
3. Users and administrators of TSL are responsible for:
- Complying with this policy.
 - Reporting suspected or actual breaches of security to the management.

Definition of the Personal Information collected

The personal information we collect depends on which of our services you use and the information you choose to provide. When you use TSL, you may choose to provide to TheScreeningLab and we may collect personal information such as:

- **your email address (*)** - used as your unique identifier to log-in and access with your secret password your results
- **your name and surname** – although your organisation may choose to assign an anonymous alias instead
- **your gender (*)** – meant as the male or female data-set you want to be compared to; note you are free to specify or not your gender
- **your date of birth (*)** - used to compare you with the relevant age data-set
- **your dominant side (left or right handed) (*)** – collected for possible future statistical analysis of results
- **your contact details** - not mandatory - e.g. address, phone number
- **cultural background and preferred sports** - not mandatory – for possible future statistical segmentation of results
- the results of your physical tests and questionnaires

(*) = Mandatory field

In addition to the information indicated above, your organization may specifically require additional fields for internal management purposes, which may be either mandatory or optional (for example, your job title or role in the team, your employee or student or athlete number, work location etc.)

Definition of Metadata based Personal Information collected

For Metadata we intend any data obtained or derived applying different forms of statistical analysis to the de-identified data stored in TSL database.

“De-identified” is defined as:

- Individual records **can't be reconnected to any individual** because they have been removed of any personal identifier such as name, surname, email address, street address, phone number contact details
- Individual records **can't be reconnected to any organization** have been removed of the “organization code” that links each record to the organization it belongs to.

TSL reserves the right to use all collected and data for future statistical analysis. All such data will be de-identified so that it will be impossible to re-connect them to any individual or organization.



Your access to your personal information

You have the legal right to access your personal information and TSL is designed to allow you to do so.

Your organizations may allow you access on a restricted basis and you will need to request assistance from within your organization to understand the procedure to access your personal information. However, most organizations set up TSL to allow subjects unrestricted access the information stored about themselves and if this is your case you can:

- log-in at the page <http://app.thescreeninglab.com/user/login> (email address and secret password required)
- Click on “My Profile” to view and edit your personal details stored on the system
- Your dashboard gives you full access to all the results of your assessments
 - o the reports of assessments already completed
 - o the categorized tracking graph of the completed assessment results
 - o the list of pending assessment scheduled for you

Should you experience difficulties in accessing your information, you have the right to require access to your records by making a written request through the proper channels of your organization.

Privacy

TSL considers sensitive and private any aspect of the information collected regarding you, including the results of your screenings or questionnaires and the preventative exercise programs produced for you. Your personal information is available:

- to you
- to the managers of areas inside your organisation granted the relevant access e.g. Human Resources, Occupational Health & Safety, Wellness
- the professionals involved with the execution of the different assessments and the evaluation of the results

Your personal information will not be disclosed outside your organisation unless written permission is given by you; third-party service providers, such as IT and software service providers, providers of research services, our professional advisers such as security consultants and auditors, may have limited or full access to the system’s database for scheduled maintenance and repairs, quality assurance testing, programmed audits purposes

TSL reserves the right to use all collected and de-identified data for future statistical analysis. All such data will be de-identified so that it will be impossible to re-connect them to any individual or organization.

Metadata Use

1. We will never use information that has not being de-identified for any secondary commercial purpose or disclose health information to any other person, without your express prior consent.



2. We will not disclose any Information of any User to any third party in any way or format which connects the User's name to the User's personal Information.
3. You authorise us to use that Information or any metadata derived from that Information for any legal purpose. Before disclosing any Information or derived metadata to any other person or using it for any secondary commercial purpose we must first ensure that any such use anonymises the Information or metadata (as the case requires) so that it cannot be linked back to a User.
4. You permit us to de-identify (anonymise) your information in a way that it can't be re-connected to you or your organisation - and analyse, review, report on, transmit, store, sell for any secondary purpose and otherwise deal legally with any Information or metadata deriving from Information you input via the Online Portal, other than health information.
5. Notwithstanding paragraph 5 above, you permit us to de-identify (anonymise) any health information forming part of any Information you input via the Online Portal and to analyse, review, report on, transmit, store, sell for any secondary purpose and otherwise deal legally with any metadata derived from it.

Enquiries

If you have questions about this Privacy Policy, if TheScreeningLab does not agree to provide you with access to your personal information; or if you have a complaint about our information handling practices, you can contact TheScreeningLab using the contact details below.

We will respond in writing within 30 days of receipt of a complaint. If you are not satisfied with our decision, you can contact us to discuss your concerns.

If the complaint remains unresolved, you have the option of notifying the Office of the Australian Information Commissioner (OAIC). Contact details can be found at OAIC's website: www.oaic.gov.au

How to contact us

By email: privacyofficer@thescreeninglab.com

Legislation

- Privacy and Personal Information Protection Act No. 133 1998

Related policies

- TheScreeningLab Information Security Management System (ISMS)

Revision history

Version	Date issued	Notes	By
0.1	15/01/2018	Draft submitted for Legal review	Massimo Raballo



0.2	10/04/2018	Draft submitted to Massimo Raballo for initial review	Dario Vanin
0.3	01/05/2018	Draft incorporating Metadata Policy submitted to Dario Vanin	Massimo Raballo
0.4	24/05/2018	First release	Dario Vanin

Review date

15/05/2018

Contact

TheScreeningLab

The Office of the Chief Information Officer

Email: security@thescreeninglab.com.au