

## **MEDIKEEPER PRIVACY STATEMENT**

**Last Updated: March 2016**

**THIS HEALTH PORTAL IS PROVIDED TO YOU BY HSS WHO HAS CONTRACTED WITH MEDIKEEPER INC., WHO ARE MANAGING AND OPERATING THIS PORTAL ON BEHALF OF PEOPLECARE**

### **1. Introduction**

At MediKeeper, we respect and protect the privacy of the users of the portals we supply and manage on behalf of our customers.

This Privacy Statement provides details of our approach to privacy and how we collect, use and protect your personal information. This privacy statement applies to the data collected by MediKeeper, or those working on our behalf, through information you enter or from the imported data from authorised and approved sources. It does not apply to data collected through other non-MediKeeper approved sites, products, or services.

### **2. Collection of your personal information**

The Service asks you to enter an identifier/user name and password to sign in. The first time you sign in to the Service, the Service asks you to create an account. To create an account, you may have to provide personal information such as name, date of birth, e-mail address, employment number or health fund membership number. These are required purely to confirm your eligibility to have access to the Health Portal by comparing them against an information file provided to us by Peoplecare.

We will use the e-mail address you provide when you create your account to allow you to receive notifications that messages or new information has been made available to you in the Health Portal or to advise you of some new functionality or feature that is now accessible through the Health Portal.

By default, you are the custodian of any records you create or information you enter into the Health Portal. Through the "Sharing and Permissions", you may invite additional people to have access to your information. You may wish to have family members, caregivers and your doctor access to your personal health information. You can choose if they have full access (with the ability to view and modify the information) or if they only have the ability to view the information. You will also be able to dictate which sections of the Health Portal you wish them to access and for how long they are able to access it. You will

receive notifications when one of these approved persons view your data. Some of the information stored in the Health Portal may be highly sensitive, so you need to consider carefully with whom you choose to share the information and who you grant access to your personal health information.

### **3. Security**

Transmissions over the Internet are never 100% secure or error-free. However, we take reasonable steps to protect your personal information from loss, misuse, and unauthorised access, disclosure, alteration, and destruction.

### **4. Sharing your personal health information**

A key function of the Health Portal is the ability to share your health information with people and services who can help you meet your health-related goals. For example, you can share your health information:

- to allow a family member or loved one co-manage your health information
- to consult with your health care provider or another medical professional
- to provide information to coaches and trainers
- to provide information to a health advocate or health advisor

Through the "Sharing and Permissions", you can choose to share information in the Health Portal with another person by sending a sharing invitation e-mail generated by the MediKeeper platform. If the person you invited to share your information accepts your sharing invitation, you have given him or her access to that information. You can specify how long they have access and whether they can modify the information in the Health Portal.

You can also choose to grant full access to other persons, such as your spouse, for any portion of your health information contained within the Health Portal. Full access is the broadest level of access, so you should think carefully before you grant full access to your health information. Every person you grant full access to has the same capabilities as you as the user and account holder has, including accessing, modifying, deleting, and sharing all the information in the record. A person who has full access to your account can also revoke access to your account for any other person you may have granted access to the Health Portal, including you. For this reason, you should consider very carefully to whom you grant full access to your account.

### **5. How we use your personal information**

We use personal information collected through the Health Portal including health information, to provide you with an assessment of your overall health and your risk for disease. We will also include your responses in aggregated and de-identified reports provided to your health fund.

In cases where coaching is offered, we will ask your permission to also provide to the coaching team the answers to some questions which you have answered in the assessment. This will reduce the need to repeat questions which you have already answered in the coaching assessment process.

AT NO TIME IS YOUR EMPLOYER OR HEALTH FUND ABLE TO SEE YOUR INDIVIDUAL ANSWERS TO THE QUESTIONS IN THE HEALTH ASSESSMENT, OR LINK THOSE ANSWERS TO YOU.

MediKeeper may access and/or disclose your personal information as required by law, in the good-faith belief that disclosure is necessary or in the interest of protecting or exercising our or others' legal rights e.g., without limitation, in connection with requests from law enforcement officials, in connection with court proceedings or disputes or to protect the personal safety and welfare of users of Health Portal or members of the public.

Personal health information collected on the Health Portal is stored and processed only in the United States of America. Your personal details used for registration purposes are stored only in Australia at HSS.

## **6. How we aggregate information and statistics**

MediKeeper may use aggregated and de-identified information collected via the Health Portal to improve the quality of the Health Portal. This aggregated information is not associated with any individual. MediKeeper does not use your individual information obtained from the paper Health Assessment for marketing without MediKeeper first asking for and receiving your consent.

## **7. Deleting your information**

You can request that MediKeeper delete your health information collected through the Health Portal at any time by contacting :

MediKeeper, Inc.  
5930 Cornerstone Court West, Suite 190  
San Diego, CA 92121  
Customer Service: 1-858-251-3250

E-mail: [customerservice@medikeeper.com](mailto:customerservice@medikeeper.com)

## **8. Links to Other Websites**

The Health Portal may contain links to other websites. We are not responsible for the content or privacy practices of those websites, including the use of personally identifiable information about you collected by those websites. We do not intentionally transfer any personally identifiable information about you to websites that we link to, but we do require that any third party application providers of tools contained within the Health Portal adhere to this privacy statement.

## **9. Privacy of Minors**

The Health Portal is intended for adults in Australia. We do not intentionally or knowingly collect personally-identifiable or personal health information from persons under the age of 18. We request that individuals under the age of 18 not submit any personal information to the Health Portal.

## **10. Security of your personal information**

MediKeeper is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorised access, use, and disclosure. For example, we store the personal information you provide on computer servers with limited access that are located in controlled facilities and the data is stored in separate encrypted locations.

## **11. Enforcement of this privacy statement**

If you have questions regarding this statement, you should first contact Peoplecare. You should immediately notify Peoplecare if you feel your personal information has been tampered with, or if you feel there has been a breach of your privacy for any reason.

## **12. Changes to this privacy statement**

We may occasionally update this privacy statement. When we do, we will also revise the "last updated" date at the top of the privacy statement. We encourage you to review this privacy statement periodically to stay informed about how we are helping to protect the personal information we collect. Your continued use of the Health Portal constitutes your agreement to this privacy statement and any updates. Please be aware that this privacy statement and any choices you make on the Health Portal do not necessarily apply to personal

information that you may have provided to MediKeeper in the context of other, separately operated, MediKeeper products or services.

### **13. Contact information**

MediKeeper, HSS and Peoplecare welcome your comments regarding this privacy statement. If you have questions about this statement or believe that we have not adhered to it, please contact Peoplecare.