

Claiming.com.au Privacy Policy

Updated 23 February 2022

While this Privacy Policy (together with our Service Agreement and any other documents incorporated by reference) is directed at our customers ('you' or 'your') as vendors of practice management systems, we understand that it may also be helpful for Health Practitioners who work with our customers and use practice management systems to understand how we deal with the data supplied to us. Accordingly, our Privacy Policy explains what information we collect about our customers as well as about Health Practitioners and their Patients, how we use the information we collect, how we share the information we collect, who we share the information with and how you can access and control your information. Please read the following carefully to understand our views and practices regarding Personal Information and how we will treat it.

Definitions

In this Privacy Policy, the following definitions apply:

- **API** means the medical billing application programming interface operated by us;
- any reference to '**Claiming.com.au**', '**us**', '**we**' or '**our**' means Sapient Pty Ltd ACN 165 035 987 trading as Claiming.com.au;
- **GDPR** means the General Data Protection Regulation;
- **Health Practitioner** means a health practitioner who uses your practice management system;
- **Patient** means a patient of a Health Practitioner;
- **Personal Information** means any information relating to an identified or identifiable natural person and includes information about you, your customers and their patients.

What Personal Information do we collect?

We collect the following types of information about you and your customers:

Information that you provide to us directly

(A) Visiting our website

When you visit our website, we collect the following information (which includes Personal Information) from you:

- where you sign up to our newsletter or send us an enquiry, we collect your name and email address, as well as any other information you choose to supply.

(B) Signing up to our API

When you use our API, we collect the following information (which includes Personal Information) from you:

- your name, email addresses, registered business address, ABN

- to the extent reasonably necessary for us to provide you with our products and services, the name, address, date of birth, phone number, email address, Medicare details and private health fund details of Patients.
- the healthcare identifier number, name, address, phone number, practice name and email address of Health Practitioners.

Device information

When you use our API or visit our website, we automatically collect certain information through our use of device identifiers and other technologies. The information that we collect includes:

- your IP address;
- your operating system; and
- software performance data.

How do we use your Personal Information?

We use the information we collect about you for the following purposes:

- **Providing our products and services:** We use the information that you provide to us to facilitate electronic claims from Health Practitioners to Medicare Australia, the Department of Veterans' Affairs and Australian Registered Health Benefits Organisations. We also use the information to allow you to access our API and to bill you for each such use of our API.
- **Communicating with you:** We use your contact information to send communications to you about important changes or updates to our products and services. When in line with the preferences you have shared with us, we also provide you with information or advertising relating to our products and services.
- **Performing data analytics:** We use the information about you to help us improve our products and services, including by generating analytics about how our customers browse and interact with the Site and to assess the success of our marketing and advertising campaigns.
- **Customising our products and services for you:** We use information about you to make sure that the API and our products and services are customised to your needs.
- **Keeping our API secure:** We use information about you to screen for potential risk and fraud, and to identify violations of this Privacy Policy or our Terms of Use.
- **Where required by law:** We will use or disclose your information where we reasonably believe that such action is necessary to: (a) comply with the law and the reasonable requests of law enforcement or a government authority; (b) to enforce our Terms of Use or to protect the security and integrity of our API; and/or (c) to exercise or protect the rights, property or personal safety of Claiming.com.au, our customers or others.

- **Where you have given your consent:** We may seek your consent to use your information for a particular purpose. Where you give your consent for us to do this, we will use your information in accordance with that purpose. You can withdraw your consent to these uses at any time.

We rely on the following legal bases to process this information:

- where you have given your consent for us to use your information or your customer has given you their consent for you to supply us with the information;
- where the processing is necessary to perform a contract that we have with you, for example when you access our API;
- our legitimate business interests, such as improving and developing our products and services and marketing new features or products (but only where our legitimate interest is not overridden by your interest in protecting your Personal Information); and
- where it is necessary for compliance with our legal obligations.

You may at any time refuse to provide the Personal Information that we request. However, this may limit or prohibit our ability to provide our products and services to you. You may withdraw your consent for us to process Personal Information at any time by contacting us in accordance with our 'Contact us' section below.

Who do we disclose Personal Information to?

Outside of authorised personnel employed by us, we only share your Personal Information with Services Australia, the Department of Veterans' Affairs and Australian Registered Health Benefits Organisations. We rely on the authority given to us under our Notice of Integration with Services Australia.

We do not disclose or transfer any Personal Information outside of Australia, under any circumstances

Changing or deleting your Personal Information

Our customers may also access, review, update, rectify or delete Personal Information by contacting us. We will respond to all requests within 30 days and may request that you verify your identity before we make any changes to the Personal Information we hold. Please note that deleting your Personal Information may limit our ability to provide our services to you.

You can also stop receiving promotional email communications from us at any time by clicking on the "unsubscribe link" in the relevant communication.

We may limit or reject your request in certain cases, including without limitation where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, where the rights of other persons would be violated, as required by law or governance purposes, or if we do not agree that the Personal Information requires correction. If we refuse a deletion or correction request, we will provide you with a written notice stating our reasons for the refusal. We may also seek to recover from you reasonable costs incurred for providing you with access to any of the Personal Information held by us.

If you need further assistance regarding your access and control of your Personal Information, please contact us.

Security

We follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it (including encryption and password protection). Each of our employees is aware of our security policies, and your information is only available to those employees who need it to perform their jobs.

However, no method of transmission over the Internet using industry standard technology is 100% secure. Therefore, we cannot guarantee the absolute security of your information.

Data Retention

When you submit Personal Information to us, we will maintain this information for our records because we need this information to operate the accounts you have with us, to deliver our products and services to you and for the other purposes set out in the 'What Personal Information do we collect?' section. We will retain this information until we no longer need the information for the purposes for which it was provided or as otherwise permitted by law or until you ask us to delete this information in accordance with our 'Changing or deleting your Personal Information' section above. If and when we are no longer required to retain this Personal Information in accordance with our Privacy Policy, we will either delete or anonymise the Personal Information within 30 days.

Changes to our Privacy Policy

We reserve the right to modify this Privacy Policy at any time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. If we make material changes to this Privacy Policy you will be notified via email (if we have your contact information) or otherwise in some manner through our services that we deem reasonably likely to reach you. Any modifications to this Privacy Policy will be effective upon our publication of the new terms and/or upon implementation of the new changes to our services (or as otherwise indicated at the time of publication). In all cases, your continued use of our services or API after the publication of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

Contact us

Thank you for taking the time to read this. Please don't hesitate to get in touch if you have any queries about the use of your private information – email us at support@claiming.com.au or write to us at Ground Floor, 5 Victoria Parade Manly NSW, 2095.

If you believe we have breached the Australian Privacy Principles, you must first complain directly to us and we will respond to your complaint within 30 days. If our response is not satisfactory, you are entitled to complain to the OAIC in writing using the form hosted by the Australian Government on the business.gov.au portal.