



Privacy Policy

How we collect, use, share and protect your personal information

About this policy

JP Plan Management Pty Ltd ("we", "us", "our") is a registered NDIS plan management provider (registration number 4050123867). We respect your privacy and are committed to protecting the personal information that participants, their families, nominees and representatives, support providers and others trust us with.

This policy explains what personal information we collect, why we collect it, how we use, share and protect it, and how you can see it, correct it or make a complaint. We manage personal information under the Privacy Act 1988 (Cth) and the Australian Privacy Principles, the National Disability Insurance Scheme Act 2013 (Cth), the NDIS Code of Conduct, and applicable state and territory health records laws, including the Health Records Act 2001 (Vic).

If you would like this policy explained, or given to you in Easy Read, large print or another language or format, please contact us.

Information we collect

We only collect the information we need to provide our services. This may include:

- your name, date of birth and contact details;
- your NDIS number, NDIS plan details and funding information;
- details of your nominee, guardian, support coordinator, emergency contact or other representative;
- information about your disability, health and support needs, where it is relevant to managing your plan;
- invoices, service agreements and payment records for your supports, and your bank details if we reimburse you; and
- for support providers, business and payment details; and for job applicants and workers, employment history and NDIS Worker Screening Check outcomes.

Health and disability information is sensitive information. We only collect it with your consent or where the law allows, and we give it extra protection.

How we collect information

Wherever possible, we collect information directly from you or from someone you have authorised to act for you, such as your nominee or guardian. With your consent, or where the law allows, we may also collect information from the National Disability Insurance Agency (NDIA), your support coordinator and your support providers (for example, when they send us invoices). If a participant is a child, we deal with their parent or legal guardian.

You can make a general enquiry without telling us who you are. However, we cannot manage your NDIS plan without knowing who you are.



How we use your information

We use your personal information to:

- provide plan management services, including checking and paying invoices, reimbursing you and claiming funds from the NDIA;
- give you budget statements and keep you informed about your plan;
- communicate with you, your representatives and your providers;
- prevent and detect fraud or misuse of NDIS funds;
- manage complaints, incidents, risks and service quality; and
- meet our legal obligations as a registered NDIS provider.

Consent and sharing your information

We ask for your consent when you start using our services and explain who we may share your information with. You can withdraw or change your consent at any time by contacting us, although this may affect our ability to provide some services. We may share your information with:

- the NDIA, to process payments from your plan;
- your support providers, nominee, support coordinator and others you have authorised;
- our back-up plan management provider (another registered NDIS plan manager), only if we are unable to deliver our services because of an emergency or the unavailability of key personnel, and only what is needed to keep your providers paid;
- trusted service providers who help us run our business (such as our plan management software, IT and accounting providers), who must keep your information confidential and secure; and
- our auditors, insurers and professional advisers.

Sometimes we may share information without your consent where the law requires or allows it. This includes reporting certain incidents to the NDIS Quality and Safeguards Commission, responding to a lawful request from a court, government agency or law enforcement body, or where we believe sharing is necessary to prevent a serious threat to someone's life, health or safety. Where it is safe and appropriate, we will tell you when this happens.

We do not sell your personal information.

Storage and security

We store information securely, mainly in electronic systems protected by access controls, passwords, multi-factor authentication and encryption. Only workers who need your information to do their job can see it, and all workers are bound by confidentiality obligations.

Your participant records, emails and files are stored in Australia by our plan management software provider and Microsoft 365, including backup copies.

Some of our service providers may process or access limited information from outside Australia:

- **Security software (ESET):** to protect against viruses, scams and phishing, emails, attachments and files may be scanned in, and suspicious files sent to, ESET's security systems in Slovakia, other European countries and the United States.
- **Microsoft 365 and our plan management software:** in rare cases, authorised support staff located overseas may need to access information to provide technical support or keep the service secure.

When this happens, access is restricted to what is needed, information is encrypted where possible, and the providers are bound by confidentiality and security obligations. We take reasonable steps to



make sure overseas providers protect your information in line with the Australian Privacy Principles. We do not sell your information or send it overseas for any other purpose.

We keep records for as long as the law requires. NDIS records, including records of complaints and incidents, are kept for at least seven years. When information is no longer needed, we securely destroy or de-identify it.

Data breaches

If a data breach happens, we act quickly to contain it and reduce any harm. If the breach is likely to cause serious harm, we will notify you and the Office of the Australian Information Commissioner (OAIC) under the Notifiable Data Breaches scheme. We also manage the breach through our incident management system and report it to the NDIS Commission where required.

Automated decision-making

We do not use computer programs to make decisions about you. Decisions such as whether an invoice is paid from your plan are made or reviewed by our workers.

Before claims are processed, our software runs automated data-matching checks against publicly available sources to confirm that providers meet NDIS requirements. These checks use provider details only. Any issues flagged are reviewed by our workers, who check the information and decide what happens next.

Our website and communications

Our website uses cookies and analytics tools to help it work properly and to understand how it is used. You can turn off cookies in your browser settings. We may send you updates about our services or changes to the NDIS. Every marketing email includes an unsubscribe option, and you can opt out at any time. This will not affect important messages about your plan.

Seeing and correcting your information

You can ask to see the personal information we hold about you, or ask us to correct it, by contacting us. We will respond within 30 days. There is no charge to make a request. If we cannot give you access or make a correction, we will explain why in writing.

Privacy complaints

If you are unhappy with how we have handled your personal information, please tell us by phone on 0401 034 538, by email to contact@jppm.com.au, or through the Contact Us form on our website. Your complaint will be handled confidentially.

A JPPM representative will contact you within 1 business day to talk through your concerns. You will be listened to and treated with respect, and we will keep you updated as we work towards a resolution. We will give you an outcome within 30 days. Making a complaint will never affect the services you receive. Our full process is in our Complaints and Feedback Management Policy, available on our website or on request.

You are welcome to ask a family member, your support coordinator, an interpreter or an independent disability advocate to help you. You can also contact:

- the NDIS Quality and Safeguards Commission at any time: www.ndiscommission.gov.au or 1800 035 544 (TTY 133 677); or



- the OAIC, if you are not satisfied with our response or have not heard from us within 30 days: www.oaic.gov.au or 1300 363 992.

Changes to this policy

We review this policy at least once a year, and sooner if privacy laws, NDIS requirements or the way we work change. When we update it, we will publish the new version on our website with the date it takes effect. If a change will make a meaningful difference to how we handle your personal information, we will let you know directly. If you would like a copy of an earlier version, please get in touch.

Contact us

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