

## Our Learning Library. Your Privacy.

### **About GAMA Healthcare Australia Pty Ltd.**

GAMA Healthcare is a global company with over 150 staff spread over 7 locations in the United Kingdom, Australia and China. As such, we're subject to data protection and privacy laws in the different countries where we operate. As a UK-based company, we are registered as a data controller (registration no. ZA308362) with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

This Notice relates specifically to the Learning Library offered and managed by our Australia-based entity, which we'll refer to as GAMA Australia.

### **Welcome to GAMA Australia's Learning Library**

The Learning Library is an interactive online learning platform with flexible training programmes designed to support healthcare professionals with their learning and development goals. It is a closed platform available exclusively to registered Learning Library Programme Leaders and End-Users that GAMA Australia has invited to the platform. They can access it directly via <https://learning.gamahealthcare.com.au/login>.

#### ***How it Works***

GAMA Australia assigns a Group ID to your organisation and sends login details to the initial contact, who becomes the **Programme Leader**. The Programme Leader is responsible for enrolling the organisation's personnel (**End-Users**) and can either invite them to register directly online or can register multiple users using a CSV file that is automatically deleted after registration. Name, Username, GroupID and password are mandatory fields. The platform will enforce a robust password policy.

The Programme Leader that decides if any other registration information is mandatory and whether to require **additional information** (e.g. Staff ID) or impose specific requirements (e.g. using first and last name as User ID).

#### **Your Privacy**

GAMA Australia (with GAMA UK's support) provides administrative support for the Learning Library on behalf of the participating organisations. We limit the personal data our personnel use or see to what is strictly necessary to provide this service.

This notice describes our privacy practices with respect to GAMA Australia's Learning Library. It explains what personal data we collect from Learning Library Programme Leaders and their end-users, why we collect it, how we use and protect it and with whom we share it.

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How and why we process your personal data, who we share it with, and why if you are an <b>End-User</b> (if your employer or client enrolled you in the Learning Library so you can take our training)	Learning Library End-User Privacy	I
How your Programme Leader uses your personal data or why certain <b>additional information</b> is required or used, such as Staff ID.  (We have taken measures to limit access to this information to your Programme Leader, so neither our team nor your colleagues should be able to see it).	Contact your Programme Leader, who requires this information for their own purposes.	Your Programme Leader's Privacy Notice
How we process your personal data if you are a <b>Programme Leader</b>	Programme Leaders' Privacy	II
To find out what <b>cookies and trackers</b> we use to help the platform function and gather analytics.  We don't use marketing or ad-targeting cookies in the Learning Library and we don't sell personal data.	Cookies, Trackers and Analytics.  Manage your preferences using our cookie widget.	III
To learn about your <b>rights</b> regarding your personal information and find out how to make a <b>complaint</b> or get more information	Your Data Rights	IV
To learn about GAMA's privacy practices generally or get more detail regarding our other websites and your other interactions with us	GAMA's Privacy Commitment	See our full <a href="#">privacy notice</a>
Information relevant to your privacy <b>compliance</b> when you use our Learning Library and to see a <b>sample privacy statement for your End-Users</b> ,	Learning Library Privacy Compliance FAQs	V

## Section I: Learning Library End-User Privacy

GAMA supports your Programme Leader get the most out of your organisation’s Learning Library experience. As such, GAMA doesn’t need to process or see the same amount of personal data your Programme Leader may need. We generally process your personal data in a de-identified or redacted form that is not directly linked to you. For example, we hash login details to avoid seeing who has specifically logged into a particular learning programme or their progress. We do not sell Learning Library-related personal data, nor do we engage in any [automated decision-making or profiling](#) of Learning Library End-Users or Programme Leaders. Finally, we do **not** use any of this personal data for target advertising or other promotions.

In contrast, **your Programme Leader can** see information that is directly linked to you, such as your progress, your viewing time, etc., in addition to generating reports for their own purposes. See our table below to learn how we process your personal data. Contact your Programme Leader to find out how they process your Learning Library-related personal data.

When you...	We use this data to...	We get it from...	We rely on (Lawful Basis)	We share it with...	It's stored in...	We keep it for this amount of time...
<b>Register for the Learning Library (as an end-user)</b>	Get your registered: Name Email address Organisation name / Group ID	You or your Programme Leader (via a CSV)	Contract	GAMA Australia personnel who run the Learning Library in hashed form to protect your identity. Your Programme Leader in identifiable form.	UK	GAMA retains hashed login details for the duration of the contract plus a short period afterward unless the Programme Leader terminates a particular End-User or deletes their data. If your Programme Leader uses a CSV to register you, we immediately delete it once registration is complete.  We purge logs every 3 years.
<b>Visit the Learning Library site</b>	IP Address to detect you are in Australia so we can serve the correct site with information approved for Australian audiences.	Your router	Legal obligation	IP Stack	N/A	We don't store it.
<b>Set your cookie choices</b>	Cookies & other technologies to	Your cookie	Legal obligation	OneTrust CookiePro	UK	See our cookie widget for details

	enable you to manage your preferences, collect proof of consent & collect analytics if you opt-in.	widget choices (opt-in or out).				and Section III of this privacy notice.
<b>Log in and/or participate in a learning program</b>	Login details (hashed credentials) & watch time to track progress within a programme without identifying the individual.	Your activity as captured in our log data.	Legitimate Interests	GAMA Australia & UK Digital teams; Our website development agency <u>Carpe Diem</u> who provides support. The data is redacted to protect your identity & that of your End-Users.	Aus. & the UK	Until the next periodic purge of logs. We purge logs every 3 years.
<b>Otherwise interact with the Learning Library platform</b>	In aggregated form to understand how visitors use our platform. See <i>Cookies, Trackers and Analytics</i> for detail.	Your website interactions, if you opt into statistics & analytics cookies.	Consent (opt-in)	GAMA Australia & UK Digital teams; Our website development agency <u>Carpe Diem</u> who provides support. They receive it in a form not linked to you.	UK & Australia. Google Analytics may store data outside the UK or Aus.	See our cookie widget for detail.

## Section II: Programme Leaders' Privacy

We only collect the information we require to register your organisation for the Learning Library and administer your account. We also collect aggregated statistical information and heatmaps to help us understand how Learning Library visitors generally interact with the platform, without focusing on any specific visitor. Only those GAMA personnel and third parties who help us deliver our services have access to this information. We limit what they can see to what is necessary to fulfil their specific tasks, which means the information they access or use is not directly linked to you.

We do not sell Learning Library-related personal data, nor do we engage in any [automated decision-making or profiling](#) of Learning Library End-Users or Programme Leaders. Finally, we do **not** use any of this personal data for target advertising or other promotions.

See the table below for more detail. Learn about your rights over this data or how to make an enquiry or a complaint under Your Data Rights.

When you...	We use this data to...	We get it from...	We rely on (Lawful Basis)	We share it with...	It's stored in...	We keep it for this amount of time...
<b>Register for the Learning Library (as Programme Leader)</b>	Name Email address Organisation name Correspondence or queries	You	Contract	GAMA Australia personnel who run the Learning Library	UK	For the duration of the contract plus an additional period. We purge logs every 3 years.
<b>Visit the Learning Library site</b>	IP Address to detect you are in Australia so we can serve the correct site with information approved for Australian audiences.	Your router	Legal obligation	IP Stack	We don't store it.	We don't store it.
<b>Set your cookie preferences</b>	Cookies & other technologies to remember your preferences, collect proof of consent & enable you to manage your preferences.	Your selections using the cookie widget (opt-in or out).	Legal obligation	OneTrust CookiePro	UK	See our cookie widget for details.
<b>Log in and/or participate in a learning program</b>	Login details (hashed credentials) & watch time to track progress within a	Your activity as captured in our log data.	Legitimate Interests	GAMA Australia & UK Digital team; Our website development	Australia & the UK.	Until the next periodic purge of logs. We purge logs

	programme without identifying the individual.			agency <u>Carpe Diem</u> who provides support. The data is redacted to protect your identity & that of your End-Users.		every 3 years.
<b>Otherwise interact with the Learning Library platform</b>	In aggregated form to understand how visitors use our platform. See <i>Cookies, Trackers and Analytics</i> for more information.	Your website interactions, if you opt in to statistics & analytics cookies.	Consent (opt-in)	GAMA Australia & UK Digital teams; Our website development agency <u>Carpe Diem</u> who provides support. They receive it in a form not linked to you.	UK & Aus.  Google Analytics may store data outside the UK or Aus.	See our cookie widget.

### Section III: Cookies, Trackers and Analytics

**Necessary Cookies:** The Learning Library Australia platform needs to collect the following cookies for the website to function and to comply with applicable laws. Google Tag Manager helps us manage these cookies.

- **Cookie choices:** To remember your cookie choices and track your consent as required by law. Our widget is powered by OneTrust CookiePro.
- **Form entries:** To capture information that Administrators provide in our JotForm form when they register. JotForm is a privacy-focused form provider that only processes this information on our behalf. Learn more about JotForm [here](#).
- **IP Address:** [IPStack](#) detects a generalised IP address so we know whether to redirect you to another version of our website (e.g. to the Australian site) and to comply with specific jurisdictional rules.
- **Event data:** To review errors and de-bug the website to ensure optimal performance. We scrub identifying elements to avoid sharing personal data with [Bugsnag](#), who does not use this data for its own purposes.

**Statistics and Analytics:** To help us understand how visitors use our website. We use a privacy-focused technology called [Hotjar](#) in addition to [Google Analytics](#), but we limit what we share. Note that Google may transfer data to the US and other countries outside Australia. You can manage your preferences using our cookie widget.

- **Heatmaps:** Snapshots of a sample of visitor traffic and interactions help us understand where users spend time and interact, so we can see what's popular or where people are getting stuck so we can make improvements. We do not link this information to individual users. We're interested in the bigger picture.
- **Session recordings:** We use Hotjar to record website visitor browser sessions without identifying individual users. Hotjar automatically suppresses any information you input into our forms, so it doesn't get recorded. We also suppress other information that could identify you.
- **Aggregate Statistics:** We're interested in the bigger picture and trends, so statistics we gather don't aim to specifically identify you. To gather data about the number of visitors, pages that referred them, general location, types of devices and browsers they use and more using Hotjar and Google Analytics. We're focused on the bigger picture so these cookies collect data in a way that does not identify anyone, however Google may match this data with other data it has about your online activity to create profiles for its own use. You can opt-out using Google's browser add-on or use a privacy browser like Brave or Firefox.
- **IP Address:** Hotjar always suppresses IP addresses. We use anonymised IP addresses with Google Analytics.
- **Unique User ID:** Hotjar sets a UUID so it can keep track of returning visitors without relying on personal data like IP Address. We have disabled the User ID feature in Google Analytics. In all cases, we're only interested in trends and the aggregate picture, not individual interactions on our website, so we don't attempt to link UUIDs to individual visitors.

## Section IV: Your Data Rights

You can contact our Privacy Manager to ask questions, express concerns or exercise your rights via email to [privacy@gamahealthcare.com](mailto:privacy@gamahealthcare.com). Find out more about your rights in the Your Data Rights here. You have the right to make a complaint at any time to us or the ICO ([www.ico.org.uk](http://www.ico.org.uk)) or to the Office of the Australian Information Privacy Commissioner (<https://www.oaic.gov.au/privacy/privacy-complaints>). We encourage you to contact us first so we can try to quickly resolve any concerns.

You have the following **rights** with respect to your personal data:

Right	What this means
<b>Access</b>	Receive a copy of the personal data we hold about you and confirm we're lawfully processing it by making a Data Subject Access Request (DSAR). It's free of charge unless your request is clearly unfounded or excessive.
<b>Rectification</b>	Ask us to update, complete or correct your personal data at any time if you detect an inaccuracy. In fact, we encourage you to do so.
<b>Portability</b>	Get any personal data you've given us in electronic form on the basis of Consent (or Contractual Necessity) in a common machine-readable format. We can also transfer it to a third party if you ask.
<b>Erasure</b>	Ask us to delete or remove personal data where there is no good reason or Lawful Basis for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to Objection. We are allowed to refuse in certain circumstances. Find out more, <a href="#">here</a> .
<b>Objection</b>	Object to any processing we do based on Legitimate Interests. You also have the right to object where we are processing your personal data in certain circumstances.
<b>Automated processing</b>	Not to be subject to ADM that has significant legal or other affects.
<b>Restriction</b>	Suspend the processing of some of your personal data, for example if you want us to establish its accuracy or the reason for processing it.
<b>Withdrawal of consent</b>	Withdraw consent at any time and we will stop processing it unless we have another legitimate basis for doing so in law. Where we rely on your consent we also explain how you can easily withdraw it.

We will need to confirm your identity and your right to access the information or exercise any of your other rights. This is to prevent personal data being disclosed to anyone who has no right to receive it. You can find out more about your rights by visiting the UK Information Commissioner's Office [website](#) or the Australian Information Privacy Commissioner's [website](#).



## **Section V: Learning Library Privacy Compliance FAQs**

### ***What is GAMA's approach to privacy?***

GAMA is focused on providing your organisation with the best Learning Library experience. We do this by ensuring our platform is responsive to your needs and those of your End-Users. We minimise the personal data we process to what is necessary to register users, administer our contract with you, provide support and understand how various users interact with our platform. That is why we redact, aggregate or de-identify as much personal data as possible, and, even then, we reduce what we collect or share with third parties that support us to the minimum required to achieve those objectives. We make it easy for you to manage your preferences using our cookie widget or by contacting our Privacy Manager. See *Your Data Rights* for details. To learn more about GAMA's privacy practices in general, please see GAMA's [full privacy notice](#), only some of which may apply to the Learning Library.

### ***Do you sell or share our personal data or that of our End-Users? Do you use our End-Users' personal data for your own purposes?***

No, we do not sell or share the Learning Library-related personal data of Programme Leaders or End-Users, nor do we engage in any automated decision-making or profiling related to the Learning Library. The Learning Library-related personal data we process is strictly used for managing the platform, our relationship with you, and to run analytics and heat maps to understand how we can improve the Learning Library user experience.

### ***How does GAMA process our End-Users' personal data when we use the Learning Library?***

Please see the *End-User Privacy* section of our Learning Library Australia Privacy Notice.

### ***What personal data does GAMA collect about me as a Programme Leader when I use the Learning Library?***

Please see the *Programme Leaders' Privacy* section of our Learning Library Australia Privacy Notice.

### ***How does my organisation process our End-Users' personal data?***

As a Programme Leader you will have access to more detailed information about your End-Users' interactions with the Learning Library. For example, you can see user-level data about viewing times, programs accessed, logins, and more. You can also generate usage reports and other statistics generated from End-User interactions with the Learning Library. Unlike GAMA, you will be able to see user names, User IDs and other information your End-Users input.

In short, it's up to you which types of personal data you wish to capture and how you wish to use it, and we recommend you make this clear in your privacy notice to your End-Users.

### ***What can we tell our End-Users about how you process their personal data on the Learning Library?***

Privacy laws vary from country to country but you are generally required to update your privacy notices to ensure you clearly inform individuals about how you process their personal data. Below is a sample statement you can include in your own privacy notice to your Learning Library End-Users to ensure they understand what using the Learning Library may mean for them, however this is not legal advice and we recommend you seek professional advice to confirm your requirements:

The Learning Library is an interactive online learning platform with flexible training programmes designed to support healthcare professionals with their learning and development goals. It is operated by [GAMA Healthcare](#) in Australia (GAMA).

***What personal data does GAMA process about me?***

When you use the Learning Library, GAMA limits the amount of personal data it processes to what is necessary to support us in using the platform and gain a better understanding of how individuals interact with the platform so they can optimise the user experience. Most of this data is redacted or aggregated to prevent GAMA from linking it directly to you. You can learn more in the End-User Privacy section of the GAMA Australia Learning Library privacy notice.

***What personal data does my organisation process about me when I use the Learning Library?***

*[We recommend you include information here about what personal data you collect, such as logins, viewing time, items viewed, progress, reports, etc. Be sure to explain why and how you will use that data, including whether you'll match it to other data you hold or share it with others, e.g. in HR training logs. Consult a professional for advice on what your legal and compliance obligations require].*