

# PRIVACY POLICY

We TOTALLY value  
your privacy!

2 JUNE 2020

## Introduction

This privacy policy is to provide information to you, our patient, on how your personal information (which includes your health information) is collected and used within our practice, and the circumstances in which we may share it with third parties.

## Why and when your consent is necessary

When you register as a patient of our practice, you provide consent for our GPs and practice staff to access and use your personal information so they can provide you with the best possible healthcare. Only staff who need to see your personal information will have access to it. If we need to use your information for anything else, we will seek additional consent from you to do this.

## Why do we collect, use, hold and share your personal information?

Our practice will need to collect your personal information to provide healthcare services to you. Our main purpose for collecting, using, holding and sharing your personal information is to manage your health. We also use de identified data directly related to business activities, such as financial claims and payments, practice audits and accreditation, and business processes (e.g. staff training). You cannot be identified through this data and we continue to ensure that it is protected. However, if you have concerns about what

we do with the de-identified data or do not wish to have your de-identified data used, please speak with reception about opting out.

## What personal information do we collect?

**The information we will collect about you includes but is not limited to:**

- names, date of birth, addresses, email and contact details
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- your appointment and billing details
- your specialist reports and test results
- your dental records
- your genetic information
- Medicare number, Department of Veterans Affairs (DVA) number and other government identifiers (where available) for identification and claiming purposes
- healthcare identifiers
- health fund details
- any other information about your race, sexuality or religion, when collected by a health service provider.

## Dealing with us anonymously

You have the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorized by law to only deal with identified individuals.

## How do we collect your personal information?

**Our practice will collect your personal information:**

- When you make your first appointment our practice staff will collect your personal and demographic information via your registration. This information may be obtained from our online booking forum- HotDoc.
- During the course of providing medical services, we may collect further personal information.
- From your guardian or responsible person
- From third parties where the Privacy Act or other law allows it- this may include, but is not limited to: other members of your treating team, diagnostic centers, specialist, hospitals, pathology and diagnostic imaging services, MyHealth Record/ PCEHR system, Electronic Transfer of Prescriptions (eTP), Medicare, DVA, your health insurer, the Pharmaceutical Benefits Scheme
- We may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media.

## Who do we share your personal information with?

### We sometimes share your personal information:

- with third parties who work with our practice for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with Australian Privacy Principles (APP) and this policy
- with other healthcare providers (eg on a letter of referral)
- when it is required or authorized by law (e.g. court subpoenas)
- when it is necessary to lessen or prevent a serious threat to a patient's life, health or safety or public health or safety, or it is impractical to obtain the patient's consent
- to assist in locating a missing person
- to establish, exercise or defend an equitable claim
- for the purpose of confidential dispute resolution process
- when there is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- during the course of providing medical services, through Electronic Transfer of Prescriptions (eTP), MyHealth Record/PCEHR system (e.g. via Shared Health Summary, Event Summary).

Only people that legitimately need to access your information will be able to do so. Other than in the course of providing medical services or as otherwise described in this policy, our practice will not share personal information with any third party without your consent.

We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

Our practice may use your details to contact you from time to time to advise you of relevant health services we have on offer (such as Flu Clinics) or to share practice news. If you do not wish to be contacted you can opt out or unsubscribe at any time.

## How do we store and protect your personal information?

### Your personal information may be stored at our practice in various forms which includes, but is not limited to:

- X-rays and CT Scans films
- Electronic Records
- Prescriptions
- Video recordings, images and teleconferencing.

Our practice stores all electronic personal information securely via an encrypted database monitored by our I.T Company. All computers require a login password as well as a password to access the clinical software database.

Rozelle Total Health staff sign confidentiality agreements on commencement of their employment. Staff receive regular training on our privacy standards.

## How can you access and correct your personal information at our practice?

You have the right to request access to, and correction of, your personal information. Our practice acknowledges patients may request access to their medical records. We require you to complete a "Request to access Medical Records" form, obtained from reception, which can be emailed or faxed to us. Our practice will respond to your request within 30 days. There is a fee of A\$25.00 per request plus postage (outside Australia).

Our practice will take reasonable steps to correct your personal information where the information is not accurate or up to-date. From time-to-time, we will ask you to verify your personal information held by our practice is correct and up-to-date either in person or by sending you a patient information update form via HotDoc SMS. This information is stored by HotDoc for 30 days before being deleted. Please see the HotDoc privacy policy here: <https://www.hotdoc.com.au/practices/privacy-policy/>. If you prefer not to use the HotDoc forum, please speak to reception who will provide you with a paper copy.

## How can you lodge a privacy related complaint, and how will the complaint be handled at our practice?

### We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing to:

The Practice Manager  
Rozelle Total Health  
579 Darling Street,  
Rozelle NSW 2039

**Phone:** 02 9087 4600 or **email**  
[manager@rozelletotalhealth.com.au](mailto:manager@rozelletotalhealth.com.au)

We will then attempt to resolve your complaint in accordance with our resolution procedure. We aim to investigate and respond to your complaint within 30 days.

If you are not satisfied that we have addressed your complaint, you can lodge a formal complaint with the Office of the Australian Information Commissioner (OAIC). Generally, the OAIC will require you to give them time to respond, before they will investigate.

### For further information visit:

**Phone:** 1300 363 992 **Fax:** +61 2 9284 9666  
**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
**Post:** GPO Box 5218, Sydney NSW 2001  
**Website:** [www.oaic.gov.au](http://www.oaic.gov.au) or  
<https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

**Policy review statement** This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and other necessary developments. Updates will be publicised on the practice's website and displayed at reception.