

# Privacy Policy

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## 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 it for directly related business activities, such as financial claims and payments, Practice audits and accreditation, and business processes (eg staff training).

## What personal information do we collect?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- healthcare identifiers

## 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 authorised by law to only deal with identified individuals.

## How do we collect your personal information?

Our Practice may collect your personal information in several different ways.

1. When you make your first appointment our Practice staff will collect your personal and demographic information via your registration through HotDocs online and in person when you present to the Practice.
2. During the course of providing medical services, we may collect further personal information for services such as electronic transfer of prescriptions (eTP or e-prescriptions), My Health record summary uploads, PenCat and other quality data systems.
3. We may also collect your personal information when you visit our website, send us an email, telephone us, make an online appointment via HotDocs and BetterConsult.
4. In some circumstances personal information may also be collected from other sources. Often this is because it is not practical or reasonable to collect it from you directly. This may include information from:

- your guardian or responsible person
- other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services
- your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

## When, why and with whom do we share your personal information?

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 APPs and this policy
- with other healthcare providers
- when it is required or authorised by law (eg 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 (eg some diseases require mandatory notification)
- during the course of providing medical services, through My Health Record Shared Health Summaries and Government campaigns for Immunisations, cervical screening and bowel screening registers.
- In transfer of medical records (TOR) to another GP Practice (requiring written patient consent)

Only people who 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 will not use your personal information for marketing any of our goods or services directly to you without your express consent. If you do consent, you may opt out of direct marketing at any time by notifying our Practice in writing.

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

Your personal information is stored at our Practice as an electronic record under Best Practice Management software protected by two levels of data encryption and accessed by secure passwords. All staff and contractors have signed confidentiality agreements.

Any paper records are scanned to the clinical system and disposed securely via a certified confidential waste shredding company.

Staff adhere to data security procedures and policies as well as information security measures including not sharing passwords or login access.

## 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 put this request in writing providing the request in person or via email to care@myhmedical.com.au. Our Practice will

respond within 30 days including information on the cost of complying with your request where applicable.

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 that your personal information held by our Practice is correct and current. You may also request that we correct or update your information, and you should make such requests in writing to address this to the Practice Manager at Mind Your Health Medical Centre or via email to [care@myhmedical.com.au](mailto:care@myhmedical.com.au) (Contact number: 02 8319 8777).

## 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 Practice Manager at Mind Your Health Medical Centre or via email to [care@myhmedical.com.au](mailto:care@myhmedical.com.au) (Contact number: 02 8319 8777).. We will then attempt to resolve it in accordance with our resolution procedure. We aim to address all written complaints and concerns within 30 days.

You may also contact the Health Care Complaints Commission. You may also contact the OAIC. Generally, the OAIC will require you to give them time to respond before they will investigate. For further information visit [www.oaic.gov.au](http://www.oaic.gov.au) or call the OAIC on 1300 363 992.

## Privacy and our website

Our Practice may from time to time undertake e-mail campaigns or newsletter subscriptions via the website. You are asked about your consent during the patient registration process and can withdraw consent at anytime.

## Policy review statement

This policy will be reviewed every 12 months and in line with legislation changes and the Practice's updated use of social media or other data systems. Patients can access updated changes via the website as well as request via email to [care@myhmedical.com.au](mailto:care@myhmedical.com.au).

## Useful Links

- Guide to Health Privacy: <https://www.oaic.gov.au/assets/privacy/guidance-and-advice/guide-to-health-privacy/guide-to-health-privacy.pdf>
- Data Breach information: <https://www.oaic.gov.au/assets/privacy/guidance-and-advice/data-breach-action-plan-for-health-service-providers.pdf>
- RACGP Privacy Policy: <https://www.racgp.org.au/privacy-policy>
- Best Practice Privacy Statement: <https://bpsoftware.net/privacy-policy/>