

## Privacy Policy

**Privacy Policy - V1 - 02-02-2023**

### **Australian Smiles Group Medical Practice Privacy Policy**

**Australian Smiles Group** is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

#### **What is Personal Information and why do we collect it?**

Personal Information is information or an opinion that identifies an individual.

This Personal Information is obtained in many ways including **[interviews, correspondence, by telephone, and by email]** and from third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

#### **What kinds of personal information do we collect?**

The type of information we may collect and hold includes:

- Your name, address, date of birth, email and contact details
- Medicare number, DVA number and other government identifiers, although we will not use these for the purposes of identifying you in our practice
- Other health information about you, including:
  - notes of your symptoms or diagnosis and the treatment given to you
  - your specialist reports and test results
  - your appointment and billing details
  - your prescriptions and other pharmaceutical purchases
  - your dental records
  - your genetic information
  - your healthcare identifier
  - any other information about your race, sexuality or religion, when collected by a health service provider.

## **How do we collect and hold personal information?**

We will generally collect personal information:

- from you directly when you provide your details to us. This might be via a face to face discussion, telephone conversation, consent form or online form
- from a person responsible for you
- 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 centres, specialists, hospitals, the My Health Record system<sup>1</sup>, electronic prescription services, Medicare, your health insurer, the Pharmaceutical Benefits Scheme

## **Why do we collect, hold, use and disclose personal information?**

In general, we collect, hold, use and disclose your personal information for the following purposes:

- to provide health services to you
- to communicate with you in relation to the health service being provided to you
- to comply with our legal obligations, including, but not limited to, mandatory notification of communicable diseases or mandatory reporting under applicable child protection legislation.
- to help us manage our accounts and administrative services, including billing, arrangements with health funds, pursuing unpaid accounts, management of our ITC systems
- for consultations with other doctors and allied health professional involved in your healthcare;
- to obtain, analyse and discuss test results from diagnostic and pathology laboratories
- for identification and insurance claiming
- you have a My Health Record, to upload your personal information to, and download your personal information from, the My Health Record system.
- Information can also be disclosed through an electronic transfer of prescriptions service.
- To liaise with your health fund, government and regulatory bodies such as Medicare, the Department of Veteran's Affairs and the Office of the Australian Information Commissioner (OAIC) (if you make a privacy complaint to the OAIC), as necessary.

## **Sensitive Information**

Sensitive information is defined in the Privacy Act.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

## **Third Parties**

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a

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<sup>1</sup> See: <https://myhealthrecord.gov.au/internet/mhr/publishing.nsf/content/home>

case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

### **Disclosure of Personal Information**

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

### **Security of Personal Information**

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information.

However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

### **Access to your Personal Information**

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

**Australian Smiles Group** will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

### **Maintaining the Quality of your Personal Information**

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

### **Our policy is to inform you of:**

- the kinds of information that we collect and hold, which, as a medical practice, is likely to be 'health information' for the purposes of the Privacy Act;
- how we collect and hold personal information;
- the purposes for which we collect, hold, use and disclose personal information;
- how you may access your personal information and seek the correction of that information;
- how you may complain about a breach of the Australian Privacy Principles and how we will deal with such a complaint;
- whether we are likely to disclose personal information to overseas recipients;

### **How can you access and correct your personal information?**

You have a right to seek access to, and correction of the personal information which we hold about you.

For details on how to access and correct your health record, please contact our practice as noted below under 'Contact Details':

We will normally respond to your request within 30 days.

**How do we hold your personal information?**

Our staff are trained and required to respect and protect your privacy. We take reasonable steps to protect information held from misuse and loss and from unauthorised access, modification or disclosure. This includes:

**Privacy related questions and complaints**

If you have any questions about privacy-related issues or wish to complain about a breach of the Australian Privacy Principles or the handling of your personal information by us, you may lodge your complaint in writing to (see below for details). We will normally respond to your request within 30 days.

**Phone: (03) 9132 0121**

**Email: [info@australiansmilegroup.com.au](mailto:info@australiansmilegroup.com.au)**

**Post: 21 Amaroo Cct, Bacchus Marsh**

**Website: <https://www.australiansmilegroup.com.au>**

**Updates to this Policy**

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.