



## **Practice privacy policy**

### **Your privacy is respected**

This practice policy outlines how the practice uses and manages your health information. The Notice to Patients is posted in our patient waiting area as a summary statement of the policy.

The practice is bound by the Australian Privacy Principles contained in the Commonwealth *Privacy Act 1988* (Privacy Act) and the *Health Records Act 2001* (Vic).

The practice will review and update this Privacy Policy on a regular basis.

### **Collection**

It is our usual practice to only collect health information directly from our patients or their authorised representatives.

In addition, personal information such as your name, address, contact details, health insurance and financial details are used for the purpose of addressing accounts to you, as well as for processing payments, collecting unpaid invoices via an external collection agency, and writing to you about our services and any issues affecting your health care.

We will only collect your email address if you send us a message or provide us with your address directly. Your email address will only be used for the purpose for which you have provided it, and it will not be added to a mailing list or used for any other purpose without your consent. We may however use your email address to contact you to obtain your consent for other purposes, but will give you the option of having your address deleted from our records at that time.

The practice may collect health information from a third party or a publicly available source, but only if the patient consents to such collection or would reasonably expect us to collect their health information from the third party, or if collection is necessary to provide the patient with appropriate health care.

### **Website statistics**

We are the sole owners of the information collected on our website. We only have access to/collect information that you voluntarily give us via email or other direct contact from you. We will not sell or rent this information to anyone.

We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request, e.g. to ship an order.

Unless you ask us not to, we may contact you via email in the future to tell you about offers, new products or services, or changes to this privacy policy.

### *Your Access to and Control Over Information*

- You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us via the contact form on our website:
- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

### *Security*

Please do not use our contact form to email us confidential information. While we will not disclose this information to anyone, it could possibly be intercepted by unauthorized entities.

### *Cookies*

We use "cookies" on this site. A cookie is a piece of data stored on a site visitor's hard drive to help us improve your access to our site and identify repeat visitors to our site. For instance, when we use a cookie to identify you, you would not have to log in a password more than once, thereby saving time while on our site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our site. Usage of a cookie is in no way linked to any personally identifiable information on our site.

### *Links*

This web site contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

### **Employer/employee responsibilities**

As an employer, the practice collects personal information related to employment and human resource management.

All staff employed in this practice are required to undergo training to understand their responsibilities in maintaining your privacy and to sign a confidentiality agreement to protect your personal information.

### **Use and disclosure**

The practice only uses health information for the purposes of providing you with health care or for purposes directly related to providing you with health care. In addition, personal information is used to administer your invoicing for dental [and/or medical](#) services, credit card payments, process health insurance claims or to collect unpaid invoices via an external collection agency. We will not use your health information for any other purpose unless one of the following applies:

1. You have consented
2. The other purpose is directly related to providing you with health services and you would reasonably expect that your information may be used for that purpose (for example, the practice may disclose your health information to another health service provider for the purpose of providing you with health care)

3. The use of your health information is required or authorised by law. This may include for the purposes of contact tracing, or any other purposes under directions from the state's Chief Health Officer during the COVID-19 pandemic.
4. Your medical history, treatment records, radiographic records and other material relevant to your treatment will be kept here. You may inspect or request copies of our records of your treatment at any time. Statutory fees may apply in relation to the types of access you seek.

### **Data quality**

The practice takes steps to ensure that the health information we collect is accurate, up to date and complete. These steps include maintaining and updating personal and health information when you attend the practice, or you advise us that your personal information has changed.

The practice keeps hard-copy and electronic records and takes reasonable steps to protect those records against loss, unauthorised access, use, modification or disclosure, or other misuse.

The practice ensures that hard-copy records are kept in locked files and there are security processes in place regarding computer access. The practice has taken steps to ensure that electronic data is backed-up.

After a period of seven years (and if you attended the practice as a child, you have reached the age of 25) we may destroy your records in accordance with applicable laws.

### **Data security**

We have deployed the following security measures to support more secure communication of sensitive information across the internet.

- Access to all practice computers is password protected.
- Any sensitive information received via electronic communication is deleted from the email server after being saved on our local server
- All outgoing emails from our practice are sent through SSL and hence are encrypted in transit  
TLS 1.2 is currently enforced for all of our dedicated email hosting accounts, providing a secure connection when using protocols such as POP3, IMAP and SMTP. TLS encrypts the data before it's sent and stays encrypted as it's being transmitted.
- Our spam filtering is powered by SpamExperts, where all incoming and outgoing emails will pass through using our fully redundant cloud scanning system. Along with inbound and outgoing filtering, SpamExperts also offers email archiving to prevent data loss, simplify e-discovery and help to achieve compliance with email archiving regulations.

### **Access and correction**

If an individual requests access to health or personal information we hold about them, or requests that we change that information, we will allow access or make the changes unless we consider that there is a sound reason under the Privacy Act, or other relevant law to withhold the information, or not make the changes.

Requests for access or correction must be in writing and directed to the practice Privacy Officer. If you have any questions, the Privacy Officer can be contacted during business hours at the practice.

The practice may charge for access to or copies of health records.

### **Marketing**

The practice's marketing functions support the growth and development of the practice and to provide you with information about services offered at the practice.

We may use parts of your health information for research purposes and marketing purposes. Should that happen, your personal identity will not be disclosed without your consent to do so.

The practice may use your information for the purpose of direct marketing; however, we will not on-sell your personal information.

The practice understands that you may not wish to receive marketing materials from the practice. If you would prefer not to receive such information, a request can easily be made to the Privacy Officer or another staff member at the practice.

### **Sending information overseas**

As part of maintaining your records, the practice may use off-site electronic data storage providers, professional indemnity insurers, marketing agencies or other third-party service entities. These providers may be located offshore.

Where practicable, we will inform you about where your information is sent; however, at all times the practice will take reasonable steps to ensure compliance with the Australian Privacy Principles in relation to any off-shore transfer of your information.

### **Non-disclosure of information**

Although we respect your right to privacy, if you choose not to provide us with information relevant to your care, we may not be able to provide a service to you or the service we are asked to provide may not be appropriate for your needs.

Importantly, you could suffer some harm or other adverse outcome if you do not provide information relevant to your care.

### **Complaints**

We take your privacy seriously. If you suspect there has been or may have been a breach of your privacy, you can complain directly to the practice Privacy Officer.

In the event of a privacy breach, the practice will comply with applicable guides or guidelines issued by the Office of the Australian Information Commissioner for the handling of privacy breaches.

For more information about Privacy laws, or to raise concerns about any matter not satisfactorily resolved with the practice you can contact the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au) or ph: 1300 363 992).

Privacy and general complaints about your care can also be directed to the Health Complaints Commissioner, [hcc.vic.gov.au](http://hcc.vic.gov.au) or ph: 1300 582 113.]

#### **Enquiries**

For further information about the practice's management of privacy, please contact our Privacy Officer:

Dr Christine Yew  
9078 4471

#### **Document details**

**Responsible person:** Dr Christine Yew

**Review cycle:** 12 months

**Date of last review:** 11/6/21

**Action required:**

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**Signed:**

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