

Privacy Policy

St Verena Medical Centre

We respect your privacy and are committed to protecting the confidentiality of your personal information. We are also committed to practicing good privacy governance and to ensuring our information handling and collection practices comply with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles constituted under the Privacy Act (**APP's**) and Privacy and Data Protection Act 2014 (Vic) (PDP Act).

This Privacy Policy outlines how we, at St Verena Medical Centre – Mount Eliza collects, stores, uses and discloses personal information (including sensitive information). This Privacy Policy also provides information on how you can access and correct the information we hold about you and our complaints process.

Please read this statement carefully and contact us if you have any questions.

1. The types of personal information we collect

1.1 Personal information

- (a) Personal information is information or an opinion about you or from which you can be reasonably identified.
- (b) The types of personal information we collect includes:
 - (i) private information, such as your name, signature, home address, email address, telephone number, country of birth, date of birth, your family history and lifestyle factors;
 - (ii) information about your working practices, such as your employment details and job title.

1.2 Sensitive information

- (a) We also collect sensitive information. Sensitive information is a form of personal information, and is information or an opinion of a sensitive nature.
- (b) In providing you our services, we may collect the following types of sensitive information:
 - (i) information about your health or mental health (including notes about the symptoms you describe or your doctor's observations, opinions of your health, prescription information, contact and billing details, test results and reports and your Medicare number);
 - (ii) your ethnicity;
 - (iii) your sexuality; or
 - (iv) your religion.

2. How do we collect your personal information?

- (a) We generally collect personal information directly from you when you:
- (i) make an enquiry;
 - (ii) book an appointment;
 - (iii) attend our practice;
 - (iv) access our website;
 - (v) booking online using our online booking system
- (b) We may also collect your personal information from third parties including service providers.
- (c) In some circumstances, personal information may also be collected from other sources, including:
- (i) Your guardian or responsible person.
 - (ii) Other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services, and pathology and diagnostic imaging services.
 - (iii) Your health fund, Medicare, or the Department of Veterans' Affairs (if relevant).
- (d) While providing medical services, further personal information may be collected via:
- (i) Electronic prescribing
 - (ii) My Health Record
 - (iii) Online appointments
 - (iv) Our marketing/advertising team
 - (v) AI use for consultation recording
- (e) Various types of images may be collected and used, including:
- (i) CCTV footage: Collected from our premises for security and safety purpose

3. What happens if you don't provide us with your personal information?

You can choose not to provide us with your personal information. However, this may prevent us from providing the assistance or services you require or from otherwise interacting with you.

4. Can you use our services anonymously or pseudonymously?

You can 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.

5. How we hold your personal information

5.1 How we hold and protect your personal information and Health Information

- (a) We hold your personal information in your medical record, in both hardcopy and encrypted electronic forms in secure databases that we own and operate or that are owned and operated by our service providers.
- (b) We have implemented security measures to protect personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure. These measures include securing information both in physical and electronic form, having internal procedures and measures limiting access to information only to those who need access for their legitimate purposes and protecting our systems with appropriate security measures.
- (c) Your treating doctor may hold their own separate medical record about you.

When and why is your consent necessary?

When you register as a patient of this practice, you provide consent for the GPs and practice staff to access and use your personal information to facilitate the delivery of healthcare. Access to your personal information is restricted to practice team members who require it for your care. If we ever use your personal information for purposes other than outlined in this document, we will obtain additional consent from you.

It is important to us that as our patient, you understand why we collect and use your personal information.

By acknowledging this Privacy Policy you consent to us collecting, holding, using, retaining and disclosing your personal information in the manners described below.

6. Why we collect and use your personal information?

- (a) We collect and use your personal information through lawful and fair means so we can perform our business activities and functions.
- (b) We may use your personal information for purposes other than the primary purpose but only if we are required or permitted by law to do so.
- (c) We will only collect your sensitive Information if:
 - (i) that information is reasonably necessary for us to carry out our functions or activities; and
 - (ii) you have consented to us doing so.
- (d) Some ways we use your personal information are:
 - (i) to provide you with health care services;
 - (ii) to communicate with you;
 - (iii) to communicate with Medicare and other government agencies;
 - (iv) to communicate with your insurer;
 - (v) to perform accounting, billing and other administrative and operational functions; and
 - (vi) to comply with any legal requirements.

7. Disclosure of your personal information

7.1 To whom do we disclose your personal information?

- (a) We only disclose your personal information for the primary purpose for which it was collected. We may disclose your personal information for purposes other than the primary purpose but only if we are required or permitted by law to do so.
- (b) We do not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.
- (c) Some third parties to whom we disclose your personal information include:
 - (i) with third parties for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with APPs and this policy
 - (ii) with other healthcare providers (e.g. In referral letters)
 - (iii) when it is required or authorised by law (e.g. court subpoenas)

- (iv) 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
- (v) to assist in locating a missing person
- (vi) to establish, exercise or defend an equitable claim
- (vii) for the purpose of confidential dispute resolution process
- (viii) When it is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- (ix) When it is provision of medical services, through electronic prescribing, My Health Record (e.g. via Shared Health Summary, Event Summary).

7.2 Do we disclose your personal information to interstate or overseas recipients?

We generally will not disclose your personal information to third parties located outside of Australia. If we need to disclose your personal to overseas recipients, we will ensure any such disclosure is made in accordance with the APPs and Health Records Act.

7.3 How is your information used to improve services?

The practice may use your personal information to improve the quality of the services offered to patients through research, analysis of patient data for quality improvement and for training activities with the practice team

We may provide de-identified data to other organisations to improve population health outcomes. If we provide this information to other organisations patients cannot be identified from the information we share, the information is secure and is stored within Australia. You can let reception staff know if you do not want your de-identified information included.

At times, general practices are approached by research teams to recruit eligible patients into specific studies which require access to identifiable information. You may be approached by a member of our practice team to participate in research. Researchers will not approach you directly without your express consent having been provided to the practice. If you provide consent, you would then receive specific information on the research project and how your personal health information will be used, at which point you can decide to participate or not participate in the research project.

8. Direct marketing

- (a) Direct marketing means using your personal information to contact you via the phone, SMS or email to promote our services.
- (b) You acknowledge that by providing us with your personal information we may contact you to promote and market our services.
- (c) We will never use or disclose your sensitive information, including your health information, for direct marketing purposes unless we have received your explicit permission to do so.
- (d) You can opt-out at any time from being contacted by us for direct marketing by contacting the clinic directly

9. How are document automation technologies used?

Document automation is where systems use existing data to generate electronic documents relating to medical conditions and healthcare.

The practice uses document automation technologies to create documents such as referrals, which are sent to other healthcare providers. These documents contain only your relevant medical information.

These document automation technologies are used through secure medical software; Best Practice.

All users of the medical software have their own unique user credentials and password and can only access information that is relevant to their role in the practice team.

The practice complies with the Australian privacy legislation and APPs to protect your information. All data, both electronic and paper are stored and managed in accordance with the Royal Australian College of General Practitioners [Privacy and managing health information guidance](#).

10. Access and correction of your personal information

10.1 Accessing your personal information

- (a) You can make a request for access to your personal information in writing.
- (b) We will endeavour to give you access to your personal information in the way you request. However, we may give you access to your personal information in a different way if the way you want to access your personal information is unreasonable or impractical.
- (c) In certain circumstances, we may not be able to give you access to your personal information. In these circumstances, we will write to you to explain why we cannot comply with your request.
- (d) We will try to respond to your request for access within 30 days of receiving your request.
- (e) While we will try to give you access to your personal information for free, we may charge you a reasonable fee to cover costs associated with:
 - (i) searching for, location and retrieving your personal information; and
 - (ii) reproducing and sending you your personal information.

10.2 Correcting your personal information

- (a) We try to ensure any personal information we hold about you is accurate, up-to-date, complete and relevant. From time to time, we may contact you to verify whether the information we hold about you is accurate, up-to-date, complete and relevant.
- (b) If you believe the personal information we hold about you is inaccurate, out -of-date, incomplete, irrelevant or incorrect, please contact us in writing using the details below and we will take reasonable steps to ensure it is corrected.
- (c) We will try to respond to your request for correction within 30 days of receiving your request.

11. Complaints

- (a) We take complaints about privacy seriously.
- (b) If you believe your privacy has been breached or have a complaint about our handling of your personal information, please contact us in writing using the details provided below.
- (c) If you make a complaint, we will respond within a reasonable time to advise you of the person responsible for managing your complaint. We will try to resolve your complaint within 30 days. When this is not reasonably possible, we will contact you within that time to let you know how long we will take to resolve your complaint.
- (d) We will investigate your complaint and, where necessary, consult with third parties about your complaint. We will decide about how to address your complaint and write to you to explain our decision.
- (e) If you are not satisfied with our decision, you can refer your complaint to the Office of the Australian Privacy Commissioner and/or to the Office of the Information and Privacy Commissioner.

12. Changes to this policy

- (a) This Privacy Policy forms part of the agreement between you and us (either in your capacity as a patient/prospective patient or a third-party service provider).
- (b) We may, from time to time, amend this Privacy Policy, in whole or part, in our sole discretion.
- (c) Any changes to this Privacy Policy will be effective immediately upon the posting of the revised Privacy Policy on our website. Depending on the nature of the change, we may announce the change on our website home page or by email (if we have your email address).
- (d) However, in any event, by continuing to use the website and/or our service following any changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Privacy Policy, as amended from time to time, in whole or part, you must terminate your use of the website and inform us immediately prior to any further receipt of our services.

13. Contact us

All questions or queries about this Policy and complaints should be directed to the St Verena Medical Centre Privacy Officer, whose details are:

Contact: Privacy Officer – Monique (practice Manager) & Dr Angel Yanny – Practice Principal

Email: practicemanager@stverenamc.com.au

For further information on your privacy rights, go to: www.privacy.gov.au