

## PRIVACY POLICY

Current: November 2025

Next Review: November 2027

We are committed to protecting the privacy of patient information and handling your personal information in a responsible manner in accordance with the Privacy Act 1988, the Privacy Amendment (Enhancing Privacy Protection) Act 2012, the Australian Privacy Principles and relevant State and Territory privacy legislation (referred to as privacy legislation).

The Australian Privacy Principles (APPs) are contained in Schedule 1 of the *Privacy Act 1988* (Privacy Act) and outline how all private health service providers must handle, use and manage personal information.

- APP 1 — Open and transparent management of personal information
- APP 2 — Anonymity and pseudonymity
- APP 3 — Collection of solicited personal information
- APP 4 — Dealing with unsolicited personal information
- APP 5 — Notification of the collection of personal information
- APP 6 — Use or disclosure of personal information
- APP 7 — Direct marketing
- APP 8 — Cross-border disclosure of personal information
- APP 9 — Adoption, use or disclosure of government-related identifiers
- APP 10 — Quality of personal information
- APP 11 — Security of personal information
- APP 12 — Access to personal information
- APP 13 — Correction of personal information

In the interests of providing the highest quality and continuity of health care, our practice has developed a privacy policy in compliance with the privacy legislation.

## Introduction

This privacy policy is applicable to both our Northern Territory and South Australian Practices and aims 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.

If the policy indicates a request should be made in writing, please address it to the Practice Manager or the Provider concerned at either-

Specialists on Eastwood - Suite 2 /Level 2 204 Greenhill Road, EASTWOOD SA 5063  
or via email [admin@specialistsoneastwood.com.au](mailto:admin@specialistsoneastwood.com.au)

## Why and when your consent is necessary

When you register as a patient with our practice, you consent to our doctors and practice staff accessing and using your personal information to provide you with quality healthcare. Only staff who need to see your personal information will have access to it. If we need to use your information for instances other than outlined in this policy, your additional consent will be requested.

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

Our practice will need to collect your personal information to provide quality healthcare services to you. Our main purpose for collecting, using, holding and sharing your personal information is to manage your healthcare. We also use it for directly related business activities, such as financial claims and payments, practice audits and business processes (eg, staff training).

## What personal information do we collect?

The information we will collect about you includes:

- names, date of birth, addresses, contact details, next of kin and emergency contact/s
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- Medicare number for identification and claiming purposes
- healthcare identifiers
- health fund details.

## 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.

We provide Feedback Complaint Forms for you to submit comments, with the option to identify yourself. These forms are located within our Waiting Room, and completed forms can be placed in the receptacle provided or handed to staff, depending on your identification requirements. A separate Practice policy governs how we manage Feedback, Compliments, or Complaints.

## How do we collect your personal information?

Our practice will collect your personal information:

1. When you make your first appointment, our practice staff will collect your personal and demographic information via your registration.
2. During the course of providing medical services, we may collect further personal information. e.g. via Shared Health Summary, Event Summary.
3. We may also collect your personal information when you send us an email, SMS or telephone us.

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 Private Health Fund, Medicare, or the Department of Veterans' Affairs (as necessary).

## Who do we share your personal information with?

Your personal information is sometimes shared:

- 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 the confidential dispute resolution process
- when there is a statutory requirement to share certain personal information (e.g., some diseases require mandatory notification)
- with third parties who work with our practice, such as technology providers. These third parties are required to comply with the APPs and this policy
- for practice audits and staff training
- through My Health Record during the course of providing medical services

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.

These are numbers, letters or symbols that are used to identify patients with or without the use of a name (e.g., Medicare numbers). Where possible, we limit the use of patient identifiers assigned by Commonwealth Government agencies to those necessary to fulfil those agencies' obligations.

We recognise the right of children to privacy regarding their health information. Based on the professional judgement of the relevant Provider and in accordance with legal requirements, it may sometimes be necessary to restrict parents' and guardians' access to personal health information. In such instances, the reason for denying access will be provided.

Our Practice recognises that patients may request their health information held by the Practice to be forwarded to another Health Provider. We require you to submit this request in writing to the Provider or the Practice Manager, and our Practice will aim to respond within 30 days. We can provide a template form for your completion to help facilitate this if necessary.

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 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 in various forms, e.g., such as electronic records, visual documents (X-rays, CT scans, videos and photos), paper files or audio recordings for transcription purposes. The Practice is secured out of business hours and is monitored. Doctors and Staff have access to the premises via a registered security key and to our computer system via individual passwords. Passwords are changed regularly and/or as required.

The majority of our Practice is paperless, with patient records stored on a computer. Paper documents containing personal identification are either shredded on-site or placed within a lockable confidential shredding bin. This receptacle is provided by a Certified Contractor.

Data is received electronically by email, fax, or by mail, and imported into patient records.

Electronic data received as an encrypted document via our medical database program is screened by our virus security agent before being imported into patient records. Digital certificates are required to share access to and deliver these documents, including PKI location or site certificates for Medicare claims/payments/access and commercial certificates for a variety of purposes, such as laboratory results or health fund access.

Data received via email, USB, or CD is scanned for virus/security risks prior to importation into our computer system to reduce the risk of our data being compromised. Given that most patients do not use encryption programs, emails between practices and patients are limited in scope, for both security and clinical safety reasons. Our patient registration forms indicate that by providing your Email address, you give permission for us to use this medium as an additional form of contact and that personal identification content will be limited, as we cannot guarantee Cyber privacy. Emails on our mail server are deleted regularly to limit the amount of personal information stored outside our medical database. Separate Practice policies are in place for Email and Internet usage.

Our computer system is maintained regularly by a reputable computer Systems Company, with our licenses, certificates, and encryption services tracked for currency. We subscribe to a well-known antivirus solution for digital security.

To protect personal identification from misuse, loss, unauthorised access, modification or disclosure, we require all staff to sign our Confidentiality Agreement. This agreement is reviewed as necessary, and staff are required to re-sign their consent if it is modified. Any Contractors are required to comply with our Confidentiality Agreement.

### 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 to the Practice Manager of either location, or our Practice will aim to respond within 30 days.

There is no charge for making the request; there may be applicable fees associated with providing this information. Each Provider sets their own fees, which are published within our Privacy Folder and are available upon request.

There are circumstances in which access may be restricted, and in such cases, the reason for the denial will be explained.

Our Practice will take reasonable steps to correct your personal information where it is inaccurate or out of date. From time to time, we will ask you to verify that the personal information we hold for you is correct and up-to-date, or we may request that you complete an updated patient registration form. Please feel free to discuss any corrections with our Practice Staff, or alternatively, make your request in writing to the Practice Manager.

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

We take privacy-related complaints and concerns seriously. Patients should always feel free to discuss their concerns with the Practice Manager. Alternatively, you should express any privacy concerns you may have in writing to the Practice Manager. We will then attempt to resolve it in accordance with our resolution procedure and aim to generate a response within 30 days.

You may also contact the Office of the Australian Information Commissioner (OAIC). Generally, the OAIC will require you to give them time to respond before they investigate. For further information, visit [www.oaic.gov.au](http://www.oaic.gov.au) or call the OAIC on 1300 336 992.

### Privacy and our website

Our website is a communication channel that requires maintenance to ensure its information is up to date and accurate. Please be aware that any personal information you send through our website or other electronic means (e.g. email), may be insecure in transit unless encrypted. Enquiries are received via our mail server, and we take the necessary steps to protect the information's security once it is received. Mail is deleted regularly to limit the amount of personal information received outside our medical database.

Specialists on Eastwood is not responsible for the privacy statements of any third-party websites accessed via links from our website. To understand how third-party websites collect, use and share information, please review their privacy policy.

### Policy review statement

This Privacy Policy is reviewed every two years. Occasionally, we may update our policies, processes, and systems for managing your personal information. We will revise this Privacy Policy to show any changes. These updates will be available within the practice, on our patient registration forms, and communicated to staff.

#### Further information on privacy legislation is available from:

##### Office of the Australian Information Commissioner

Phone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Fax: +61 2 9284 9666

Post: GPO Box 5218. Sydney NSW 2001

[www.oaic.gov.au](http://www.oaic.gov.au)

##### Health and Community Services Complaints Commissioner (HCSCC)

Phone: 08 8226 8666 1800 232 007

Email: [info@hcsc.sa.gov.au](mailto:info@hcsc.sa.gov.au)

Post: P O Box 199, Rundle Mall SA 5000

[www.hcsc.sa.gov.au](http://www.hcsc.sa.gov.au)

##### Office of the Information Commissioner

Northern Territory – 1800 005 610

<https://infocomm.nt.gov.au>

Approved by Dr Kareeann Khow	Date 3/11/2025	Review date 3/11/27
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