

# PRIVACY POLICY

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# PRIVACY POLICY

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## THIS PRIVACY POLICY APPLIES TO PERSONAL INFORMATION COLLECTED IN AUSTRALIA.

Notice: ‘We’, ‘Us’, ‘Our’ ‘Sanctuary Lifestyle Clinic’, refers to Sanctuary Clinic Services Pty Ltd (trading as Sanctuary Lifestyle Clinic) and their related entities, and bodies corporate. ‘You’, ‘Your’ refers to individual patients or customers.

## DEFINITIONS

**CONSENT** means Your permission. Your consent can be express or implied. Express consent can be written (e.g. when you sign a form or send us correspondence) or verbal (e.g. when you give us your permission over the phone or in face-to-face conversations). Your consent will be implied when we can reasonably form a conclusion from our pre-established relationship with You that You have given consent by either taking action or deciding not to take action.

**PERSONAL INFORMATION** has the same meaning that it has under the **PRIVACY ACT 1988** (Cth) and the Office of the Australian Information Commissioner’s (OAIC) APP Guidelines., namely information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is

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apparent, or can reasonably be ascertained, from the information or opinion.

## 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, current health assessment, previous health care providers
- Medicare number (where available) for identification and claiming purposes
- healthcare identifiers
- health fund/insurance details
- sensitive information including: medical history, family medical history; current health assessment

## 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. NB Medicare requires identification.

## 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.
2. During the course of providing medical services, we may collect further personal information.

Information may also be collected through My Health Record (e.g. via Shared Health Summary, Event Summary).

3. We may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media.
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, My Health Record (eg via Shared Health Summary, Event Summary).

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?

We will take reasonable steps to ensure that your personal information is stored securely and is protected from misuse and loss and from unauthorised access, modification or disclosure. We will take reasonable steps to ensure that personal information provided by You will be handled in accordance with Australian privacy laws including the Australian Privacy Principles. We maintain strict data security standards and procedures with a view to preventing unauthorised access to your data by anyone other than Us.

Your personal information may be stored at our practice in various forms. These include and are not limited to electronic records, paper records, visual records (X-rays, CT scans, clinical videos and clinical photos).

Our practice stores all personal information securely. Electronic information is stored in protected information systems with limited personnel access to only portions of the information relevant to their role. Hard copy information is stored in a secured environment with limited personnel access. Our practice has policies and procedures in place including use of strong passwords, encrypted digital transmission where necessary, secure cabinets, confidentiality agreements for staff and contractors, confidentiality training and policy and procedure reviews.

## 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 and our practice will respond within a reasonable time, usually under 30 days. The first request for access usually does not incur a charge, second and subsequent requests will incur a processing fee, details available from the Practice Manager. Our practice reserves the right for the doctor to explain in person the medical record when requested.

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 the Practice Manager, the request needs to include your signature. (Post to Suite 720, Leve 7, 1C Burdett St, HORNSBY NSW 2077; or email a scanned copy of your signed letter to [pm@sanctuaryclinic.com.au](mailto:pm@sanctuaryclinic.com.au))

## 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. We will then attempt to resolve it in accordance with our resolution procedure. Correspondence needs to include a signature, mailing address and telephone number. (Post to Suite 720, Leve 7, 1C Burdett St, HORNSBY NSW 2077; or email a scanned copy of your signed letter to [pm@sanctuaryclinic.com.au](mailto:pm@sanctuaryclinic.com.au). You should expect a turnaround time of 30 days. We respond by phone/email/letter as appropriate.

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 website does collect some contact details (name, phone number, email, etc). We interact digitally with our patients via email to confirm appointments, and we may also send SMS reminders for booked appointments.

Our website does not provide facilities that guarantee secure transmission of information over the internet. You should be aware that there are risks in transmitting information across the internet, including online forms and email. If you are concerned about conveying sensitive or personal material to Us over the internet, contact us by telephone to discuss the matter.

Our website contains links to other websites. You should take care in providing personal information to external websites linked to Our website. We are not responsible for the privacy practices of other websites or external websites linked to this website. Please refer to WordPress, Google Analytics, Facebook and YouTube privacy policies.

Our website includes links to an online appointment booking service HealthEngine, please refer to Health Engine’s privacy policy regarding their data activities, Health Engine’s services are engaged when the ‘book now’ (or similarly named) button is clicked on the SLC website.

When you access any Sanctuary Lifestyle Clinic website, we collect certain anonymous technical information about user activities on the website. This may include information such as the type of browser used to access the website and the pages visited.

Website analytics are used on the SLC website to gather general information about visits to that site, and cookies related to activities on our website. We collect standard web server/visitor traffic information, commonly referred to as aggregate information, regarding overall website traffic patterns. Normally, web servers collect this type of basic information as part of their web log processes. We only use this information for statistical, reporting and website administration and maintenance purposes. It is not used in a way that individually identifies You, and We do not report on individual users.

SLC’s social media account through Facebook shares general information and any interaction with this is optional, SLC does not collect any personal information from interactions with its social media account, note that an individual’s privacy settings and comments made when interacting with the social media account will impact on the ability of their comments/details to be visible publicly.

This information is used by Sanctuary Lifestyle Clinic to make decisions about maintaining and improving our websites and online services

## POLICY REVIEW STATEMENT

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. The policy is available on SLC’s website, any updates will be available via the website [www.sanctuaryclinic.com.au](http://www.sanctuaryclinic.com.au)

## PRIVACY STATEMENT

This general practice collects information from you for the primary purpose of providing quality health care. We require you to provide us with your personal details and a full medical history so that we may properly assess, diagnose and treat illnesses and medical conditions, ensuring we are proactive in your health care. To enable ongoing care, and in keeping with the *Privacy Act 1988* and *Australian Privacy Principles*, we wish to provide you with sufficient information on how your personal information may be used or disclosed and record your consent or restrictions to this consent.

Your personal information will only be used for the purposes for which it was collected or as otherwise permitted by law, and we respect your right to determine how your information is used or disclosed.

The information we collect may be collected by a number of different methods and examples may include: medical test results, notes from consultations, Medicare details, data collected from observations and conversations with you, and details obtained from other health care providers (e.g. specialist correspondence). Your personal information is collected and may be used or disclosed by the practice for the following purposes:

- Administrative purposes in the operation of our general practice.

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- Billing purposes, including compliance with Medicare requirements.
- Follow-up reminder/recall notices for treatment and preventative healthcare, frequently issued by SMS.
- Disclosure to others involved in your health care, including treating doctors and specialists outside this medical practice. This may occur through referral to other doctors, or for medical tests and in the reports or results returned to us following the referrals.
- Accreditation and quality assurance activities to improve individual and community health care and practice management.
- For legal related disclosure as required by a court of law.
- For the purposes of research only where de-identified information is used.
- To allow medical students and staff to participate in medical training/teaching using only de-identified information.
- To comply with any legislative or regulatory requirements, e.g. notifiable diseases.
- For use when seeking treatment by other doctors in this practice.

At all times we are required to ensure your details are treated with the utmost confidentiality. Your records are very important and we will take all steps necessary to ensure they remain confidential.

Sanctuary Lifestyle Clinic's privacy policy is available from Reception and also on our website:  
[www.sanctuaryclinic.com.au](http://www.sanctuaryclinic.com.au)

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