

# GFMC PTY LTD privacy policy

Current as of: 08/04/2023

## 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
- Medicare number (where available) 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.

## 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. For example information can also be collected through electronic transfer of prescriptions (eTP), My Health Record (MHR) eg. Via a Shared Health Summary, Event Summary eg. Transfer of medical records between medical clinics.

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, through eTP, My Health Record (eg via Shared Health Summary, Event Summary).

Our clinic uses automation technology to enter patient data in electronic forms, such as referrals and care plans. All information is reviewed by the person using this technology and only relevant patient data is included.

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.

Our practice may use your personal information to improve the quality of the services we offer to our patients through research and analysis of our patient data.

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

## How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms.

- Paper records
- Electronic records
- Visual records (medical imaging such as X-Ray and CT, medical photography)

Our practice stores all personal information securely. 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 unauthorized access, modification or disclosure. This includes:

- Strong password protections apply to all computer software.
- Two factor authentication for access to all computer software.
- Access to personal information is restricted on a 'need to know' basis.
- Holding your information on an encrypted database.
- Holding your information in secure cloud storage, stored only in Australia.
- Our staff sign confidentiality agreements.
- Our practice has document retention and destruction policies.
- Where information is provided in hard copy, it will be held in a lockable cabinet.
- Any discarded printed patient information is stored in a locked bin, and shredded by an accredited company.

## 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, handing your request directly to a staff member and showing a form of ID. Our practice will respond within 30 days. There is a \$30 fee to provide these records to you.

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, Bree Flynn ([bree@thegardenmedical.com](mailto:bree@thegardenmedical.com)).

## 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. All complaints and concerns should be forwarded to our email ([hello@thegardenmedical.com](mailto:hello@thegardenmedical.com)) or via mail to Unit 9, 170 Murdoch Drive, Murdoch, 6150. All requests will be responded to within 30 days by our practice manager.

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

The Garden Family Medical Clinic (<https://www.thegardenmedical.com>) website contains links to other sites. The Garden Family Medical Clinic is not responsible for the privacy practices of any linked sites. We encourage users who leave our site to read the privacy statements of each and every linked website that they choose to visit. All links to external sites is provided for your convenience. The information, products and advertisements contained in the linked sites are neither approved or endorsed by us, and the Garden Family medical Clinic is not responsible for such information, products or advertisements.

Your privacy is important to us and we want you to feel comfortable visiting our website. Any personal information that patients have given us, including email addresses, will be used only in the following ways:

- Personal data will be securely stored.
- We will not provide your personal data to any third party without your permission.
- We do not automatically collect your personal email address, when you visit our website site. It is provided on the registration form.
- If we join with a third party to provide services and you sign up for those services, we will share your name and other contact details, necessary, with our partner to provide these services to you.
- If you view specific pages or download information from specific pages on our website, we will track and add the number of your visits to the aggregate number of visits by all users in order to better design our website.
- We may share aggregate demographic information with our affiliates. This is not linked to an personal information that can identify you or any other visitor to our website.

## Policy review statement

The Garden Family Medical Clinic has the right to change the privacy policy at any time. If there are updates to the Garden Family Medical Clinic privacy policy, we will address the changes promptly and update the revision date of this document.