

privacy policy



DECEMBER 2024

We recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information.

This document is our privacy policy, and it tells you how we collect and manage your personal information.

We respect your rights to privacy and have a legal obligation to abide by the provisions of the Privacy Act 1988 (Cth) (the Act). The rules that an organisation must follow under the Act are known as the Australian Privacy Principles, and cover areas including the collection, use, disclosure, quality and security of personal information. Our Centres, Clinics and Call Centres are governed by a number of State-specific privacy laws.

What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information. Our privacy policy covers all people who use our services or otherwise provide their personal information to us.

For the purposes of this privacy policy, no distinction has been made between the handling of personal information and sensitive information (as that term is defined in the Act); therefore, all information will be referred to as "personal information" throughout this document.

What personal information do we collect and hold?

We may collect the following types of personal information:

- your name, address and telephone number;
- your age or date of birth;
- your Medicare number, Veterans' Affairs number, Health Care Card number, health fund details or pension number;
- current drugs or treatments used by you;
- information relevant to your medical care, including but not limited to your previous and current medical history and your family medical history (where clinically relevant);
- your ethnic background;
- your profession, occupation or job title;
- the name of any health service provider or medical specialist to whom you are referred, copies of any letters of referrals and copies of any reports back; and
- any additional information relating to you that you provide to us directly through our representatives, medical or allied health professionals providing services at or from our Centres, Clinics or Call Centres, or otherwise.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in ways including:

- by you completing one of our registration or patient information forms;
- as disclosed by you during the course of a consultation at our Centres, Clinics or Call Centres;
- we will produce a temporary audio recording of consultations to utilise the speech to text functions of Artificial Intelligence (AI) medical scribe tools (such as Lyrebird Health AI and Heidi Health AI). These scribe tools are now commonly used in general practice to draft documents like clinical notes and medical certificates. The recording is deleted after the transcription is complete; or
- through your access and use of our website.

We may also collect personal information from third parties including:

- information provided on your behalf with your consent;
- from a health service provider who refers you to medical practitioners or allied health professionals providing services at or from our Centres, Clinics or Call Centres;
- from health service providers to whom you are referred;
- from your employer or prospective employer; or
- from third party bodies such as law enforcement agencies and other government entities.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested services to you, either to the same standard or at all; or
- your diagnosis and treatment may be inaccurate or incomplete.

What happens if you do not consent to our Email and SMS Policy?

- your GP will not be able to email or SMS you to provide any information relevant to your health
- the Practice will be unable to communicate with third parties such as DVA, WorkCover, specialists, and other referral sources, on your behalf via email. This will result in you being required to collect hard copy documents in clinic and provide these documents to the third party.
- GO2 Health will charge an administrative fee for each document produced where postage is required (that would normally be communicated through email or SMS). You accept your responsibility for this fee by accepting our Privacy and Email Policies.

For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of service to you.

Our preferred methods of communication in executing our business activities will include the use of emails and SMS. Please refer to GO2 Health's Email Policy in this regard.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide medical services and treatment to you, and to enable you to be attended by medical practitioners or other allied health professionals at our Centres, Clinics or Call Centres;

- for administrative and billing purposes;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country;
- for the purposes of data research and analysis including conducting clinical trials and proactive screenings and for the purpose of sending you direct marketing communications in relation to these, and to our contractors who may use it for the same purposes;
- for inclusion in a recall register to be advised of follow up visits and medical updates;
- for the purpose of reporting back to your employer or prospective employer, their authorised representatives and their insurer in the case of a work-related consultation or service;
- to answer enquiries and provide information or advice about existing and new products or services and all matters relevant to the services we provide to you;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of the IPN Group, its contractors or service providers; and
- to meet obligations of notification to our medical defence organisations or insurers.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy or as permitted under the Act.

To whom may we disclose your information?

We may disclose your personal information to:

- our employees, our medical professionals and allied health practitioners who provide medical services to you at our Centres and Clinics, related bodies corporate, contractors or service providers for the purposes of operation of our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- your employer or prospective employer, their authorised representatives and their insurer in the case of a work-related consultation or service; and
- any organisation or person for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with any of our related bodies as necessary for optimum health management.

Direct marketing materials

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with all applicable marketing laws, such as the Spam Act 2003 (Cth). If, in your dealings with us, you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you

may opt-out of receiving marketing communications from us by contacting us or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you and, if so, the fees will be as advised from time to time. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold; however, we will only do so in accordance with our rights and obligations under the Act. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may send us a written request for us to amend it, including the basis on which you are requesting the amendment. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us in accordance with the arrangements set out below and provide details of the incident so that we can investigate it.

Our procedure for investigating and dealing with privacy breaches is for the incident or complaint to be dealt with in the first instance by the particular Centre, Clinic or Call Centre at which you received our services. If the issue cannot be resolved at this level, it will be escalated to the Practice Manager for review and resolution.

Do we disclose your personal information to anyone outside Australia?

In the event that GO2 Health is required to process your medicolegal documents that are created by our doctors, GO2 Health utilises a contracted medicolegal administration service located in New Zealand for the secure processing of these documents. Your information will not be stored outside of GO2 Health's server located in Australia.

All data produced by our medical scribe tools will be securely stored on servers located within Australia.

Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form and comply with the Australian Privacy Principles.

As our website is linked to the internet, and the internet and email traffic is potentially inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Links

Our websites may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website, and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact the Centre, Clinic or Call Centre at which you received our services.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

If you are unable to contact the Centre, Clinic or Call Centre at which you received our services, you may contact us by using the following details:

Practice Manager
GO2 Health Pty Ltd
455 South Pine Rd
Everton Park 4053

Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated on 22 March 2023.

Definitions

In this document, the terms "we", "our", "us" or "GO2 Health" mean GO2 Health Pty Ltd.

email & sms policy

MARCH 2023

We use email as a method of communication to conduct our business. If a patient has provided GO2 Health with their email address, it is deemed that consent for email correspondence has been provided. Should a patient wish to withdraw this consent, they should contact reception to have this recorded.

If you do not wish GO2 Health to communicate via email with yourself or relevant third parties on your behalf, GO2 Health will charge an administrative fee for each document produced where postage is required that would normally be communicated through email or SMS. You accept your responsibility for this fee by accepting our Privacy and Email Policies.

Patients may choose to opt out of electronic communications for any of the following by contacting reception and completing the opt out form.

- Appointment reminders
- Clinical Communication
- Clinical reminders
- Health awareness

As per the GO2 Health Privacy Policy:

Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification, or disclosure. We may hold your information in either electronic or hard copy form and comply with the Australian Privacy Principles.

As our website is linked to the internet, and the internet and email traffic is potentially inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

GO2 Health uses an email disclaimer notice on outgoing emails. The disclaimer is as follows:

This email transmission is strictly confidential and intended solely for the person or organisation to which it is addressed. It may contain privileged and confidential information and if you are not intended recipient, you must not copy, distribute or take any action in reliance on it. If you have received this email in error, please delete it then notify us on (07) 3355 5540 as soon as possible.

Patients will be advised through the consent form and via our website that:

- Emails are monitored and actioned where possible within 3 business days
- Patients should not use email to contact the practice in the event of an emergency
- Patients should not use email to book or cancel an appointment (unless they are overseas). Online HotDoc booking services are available.
- Patients should not use email to request scripts or referrals. (This requires a booked appointment with the GP)

The Practice email account for patients and stakeholders for non-urgent communication with the practice is ask@go2health.com.au. This email account is routinely monitored throughout the day by our team.

Policy review statement

This policy will be reviewed regularly to ensure it reflects the current processes and procedures of GO2 Health in line with current legislative requirements.