

Current as of: 29/03/2021

Introduction

In this privacy policy, the expressions “GO2Health”, “we”, “us” and “our” are a reference to GO2 Health Pty Ltd and its Related Bodies Corporate (as defined by s9 of the *Corporations Act 2001* (Cth)).

This privacy policy is to provide information to you 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.

‘Personal information’ is information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent or can be reasonably ascertained, from the information or an opinion.

‘Sensitive information’ is a subset of personal information. It means information about an individual’s racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or health information about an individual. We collect your health information due to the products and services we provide and do so with your consent.

Why and when your consent is necessary

When you register as a patient of our practice, you provide consent for our GPs, practitioners 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 (e.g. staff training).

What personal information do we collect?

The information we will collect about you includes:

- Enquiries: If you contact us via phone or through our website to make an enquiry—
 - Your full name
 - Your email address
 - Any other information you offer in the body of your enquiry
- Patients: If you, or your health practitioner on your behalf, make a booking for a consultation with us or you complete our health assessment form—
 - The details listed above for an enquiry, as well as the following
 - Date of birth, addresses, contact details
 - Your medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
 - Your Medicare number (where available) for identification and claiming purposes
 - Your healthcare identifiers
 - Your 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 will collect your personal information:

- When you call us or lodge an enquiry on our website, we collect from you the personal information listed above for ‘Enquiries’
- We collect from you the personal information listed above for ‘Patients’ prior to or at the time of providing our services to you. We do this in the following ways:

1. When you make your first appointment or register through our online booking system 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.
 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
 - others 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 Veteran's Affairs (as necessary).
- When you apply for employment with us, we collect from you the personal information listed above for 'Applicants'. You will supply us this information by issuing us with your CV or resume or applying online.
 - If we engage you as a contractor, we will collect the personal information listed above for 'Contractors' at or prior to the time you commence your engagement with us.
 - As much as possible or unless provided otherwise under this policy, we will collect information directly from you. In the case of 'Patients', we have noted above where we may be required to collect some types of personal information from third parties.
 - Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory data or other information, we require in order for us to provide our services to you, we may be unable to effectively provide or provide our services at all.

How do we use and who do we share your personal information with?

We will only use or disclose your personal information for the primary purposes for which it was collected, as set out below or as consented to.

You consent to us using and disclosing your personal information:

- For 'Enquiries' - enabling us to consider and respond to your enquiry
- For 'Patients' - to enable us to provide you with our health services, we disclose your information to:
 - 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
 - other healthcare providers
 - when it is required or authorised by law (e.g. 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 (e.g. some diseases require mandatory notification)
 - to provide customer service functions, including handling customer enquiries and complaints
 - to update your MyHealthRecord (if active).

We may also disclose your personal information and in doing so we are not required to seek your additional consent, when disclosed for a purpose related to the primary purpose or we have reason to suspect an unlawful activity is being engaged in.

Only people that 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.

Except as described further below, 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.

When will we disclose information outside of Australia?

Cross border disclosure

We may disclose your name and email address (but not your residential contact details or health information) to, and hold the same at, destinations outside Australia including but not limited to the United States, where we use third party service providers to assist us with providing our services to you. This includes overseas IT services (including software, platforms and infrastructure) such as email or newsletter mailing providers.

We have engaged MailChimp (based in the United States) to assist us with providing our services to you.

In distributing newsletters, MailChimp will collect personal information from you, including email addresses you have provided to DPS for the purpose of receiving electronic newsletters, and all information relating to those email addresses. MailChimp also uses cookies, web beacons and Flash player codes to collect information about: when you access our electronic newsletters; your browser type and version; and your operating system and other similar information.

For more information about the types of information that MailChimp may collect, please refer to MailChimp's Privacy Policy <https://mailchimp.com/legal/privacy/and Terms of Use Mailchimp's Legal Policies | Mailchimp>. MailChimp will use the information collected from you for the purpose of hosting the online platform to enable us to create, send and manage electronic newsletters. MailChimp will also use this information to measure the performance of our electronic newsletter campaigns.

MailChimp may transfer this information to its contractors or other third parties who process the information on MailChimp's behalf, or where otherwise required to do so by law.

Informed consent

By submitting your personal information to us, you expressly agree and consent to the disclosure, transfer, storing or processing of your personal information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to personal information. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

The *Privacy Act 1988* requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your personal information outside of Australia do not breach the Australian Privacy Principles contained within the *Privacy Act 1988*. By providing your consent, under the *Privacy Act 1988*, we are not required to take such steps as may be reasonable in the circumstances. However, despite this, we acknowledge the importance of protecting personal information and have taken reasonable steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

What if you do not consent to overseas disclosure?

If you do not agree to our disclosure of your personal information outside Australia, you should (after being informed of the cross-border disclosure) tell us that you do not consent. To do this, either elect not to submit the personal information to us after being reasonably informed in a collection notification, or please contact us via the details set out in this Privacy Policy.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms, such as electronic and paper records. Visual imaging such as X-rays and CT scans may be stored temporarily.

Notwithstanding the above, we will take reasonable steps to:

- make sure the personal information we collect, use or disclose is accurate, complete and up to date
- protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods
- permanently de-identify personal information if it is no longer needed for its purpose of collection.

Our practice stores all personal information securely. Electronic information is stored in protected information systems, and hard copy format in secured cabinets. Confidentiality agreements are in place for all staff and contractors.

Under Australia's Notifiable Data Breaches Scheme, we are required to provide the Australian Information Commission with a Data Breach Statement if and when an "eligible data breach" occurs. If an eligible data breach occurs in respect of the personal information, we hold about you, we will notify you directly or publish a statement on our website.

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 via letter or email, and our practice will respond within 30 days. We do not charge you for access to your personal information, but we may charge a fee to recover our administrative costs in searching and providing you with access to the requested personal information.

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 your personal information held by our practice is correct and up-to-date. You may also request that we correct or update your information, and you should make such requests in writing to our Practice Manager (ask@go2health.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 standard resolution procedure. Please forward any complaints to our Practice Manager on email ask@go2health.com.au, or telephone: 07 3355 5540 or write to us at 468 South Pine Road, Everton Park 4053. We will respond to your complaint promptly, and usually within 30 days.

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 or call the OAIC on 1300 336 002.

Privacy and our website

We maintain a digital website and social media presence, which may collect limited personal information such as website analytics and cookies. Some personal information will be collected via our online booking system. A cookie does not identify you personally, but it does identify your computer. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

We may gather your IP address as part of our business activities and to assist us with website operational or support issues. The information does not identify you personally.

If you are taken to a third-party website from our website, this policy no longer applies to your personal information. Instead, you will need to review the privacy documentation on the third-party website.

Policy review statement

This is a compliance document prescribed by law, rather than a legal contract. However certain contracts may incorporate all or party of this policy and impose such obligations on you, but not on us.

This policy will be reviewed or as needed should changes need to be made (in our sole discretion). Changes will be displayed at reception and on our website.