

# Nyora Medical Centre - Privacy Policy

## Overview

Nyora Medical Centre is committed to ensuring the privacy and confidentiality of your personal information.

What follows is important information we need to share with you, so we recommend taking the time to read through the details so you can understand our Privacy Policy.

Nyora Medical Centre must comply with the National Privacy Principles (NPPs) and this policy is consistent with the Australian Privacy Principles of the Privacy Act 1988.

The purpose of this Privacy Policy is to communicate to you how Nyora Medical Centre will handle your health information and metadata. It gives you information of the type of personal information that the practice may hold about you and the way we may deal with that information.

Nyora Medical Centres' Privacy Policy covers:

- ❖ Why and when we collect your information
- ❖ How and when we collect your personal information
- ❖ What we know about you
- ❖ How we may handle or disclose what we know
- ❖ How it's protected (security, access)
- ❖ How we maintain accuracy and manage changes

Because your information is so important to us, we will always be honest and transparent about how we handle it.

It all comes down to our practice wanting to be more than just a medical service provider. Every day we're using information collected to improve our practice and provide better outcomes.

To provide you with the health care services that you have requested, we will need to collect and use your personal information. If you provide incomplete or inaccurate information to us or withhold personal health information from us, we may not be able to provide you with the services you are seeking.

## Why Nyora Medical Centre collects personal information:

Nyora Medical Centre collects information from you when it is reasonably necessary for us to conduct the services you may need. That means we collect it to supply you with the answers, services and products you have asked for and to provide you with the best possible outcomes.

Often this may include collecting information about your health history, family history, your ethnic background or your current lifestyle to assist the healthcare team in diagnosing and treating your condition.

Other reasons we collect personal information are to:

- ❖ Understand you, and how we can meet your needs now and in the future

- ❖ Develop or evaluate your current and future health
- ❖ Create improved information for our website and other material
- ❖ Manage our business
- ❖ Comply with our legal obligations
- ❖ Claim payment from Medicare and insurers
- ❖ Comply with hospital and 3rd party collaborators information needs
- ❖ Comply with our reporting and other obligations to third party collaborators or facilities (like assisting medical professionals, theatre staff, insurance or finance companies and post-operative support teams)
- ❖ Send and receive correspondence and reports to and from our clinical desktop system to other healthcare providers using conforming secure messaging software
- ❖ Support other healthcare providers in our practice to actively use secure messaging software to send and receive patient documentation, where feasible
- ❖ Assist in the ongoing development of care plans and therapeutic pathways
- ❖ Adhere to the use of compliant software to ensure that message contents are encrypted for the entire transmission process using appropriate digital certificates

The type of information we collect may include:

- ❖ Personal information like your name, address, date of birth, gender
- ❖ Occupation, interests, location, contact details, payment details, financial information
- ❖ Information about how and where you were referred to us
- ❖ Health information including medical results, clinical and medical records
- ❖ Family medical history and their details
- ❖ Other medical service providers' commentary, diagnosis and test results

There are a few different ways we collect this information:

### **What we collect straight from you:**

Nyora Medical Centre collects most personal information directly from you. This could include:

- ❖ Information from a form online or in the clinic, or give it to one of our team on the phone
- ❖ We also collect personal information during our relationship with you. For example, we may collect personal information:
  - When you pay your bill, or make an appointment
  - During a consultation
  - Completing a form (online or in the rooms)
- ❖ We may also monitor and/or record telephone conversations with you from time to time in order to train staff and to improve our service to you.
- ❖ While visiting our website(s) and apps that may use cookies and other digital identifiers. These include:
  - site performance identifiers: these give us information about how our websites or apps are used. This helps us provide you with a more user-friendly experience.
  - Analytics cookies: we use these to gather statistics about our site and apps. For example, they help us monitor how many users are on the site or app, and what sections are most popular.
  - Advertising cookies: we use these cookies to improve our understanding of the kind of advertising that may be relevant to your aggregated segment.
- ❖ We may also use cookies or digital identifiers so that when you visit third party websites, relevant advertising our practice can be displayed to your aggregated segment. It's important to know you can clear cookies or digital identifiers from your device and disable future use of them by changing the

security settings on your web browser. However, doing this might mean that parts of our website(s) or apps may not work as they should.

## **What Nyora Medical Centre collects from others:**

Other people might give us personal information about you. This could include information obtained from:

- ❖ Your employer, parent or guardian if you are under 18
- ❖ Other companies that can disclose it to us, if it's not practical to collect it from you including personal information from trusted sources and professional service providers.

We will take reasonable steps to make sure you know we have your personal information, how we obtained it and how we'll handle it.

## **Your credit situation:**

We may collect some types of personal information to assess your credit situation when you apply for certain services. For more details, see the section on 'Credit-related information' further below.

## **Insights from statistics and research:**

We aggregate and process personal information to generate new insights about our services, performance, products and patient sentiment, so we can provide you with improving services.

## **Sensitive personal information:**

When we talk about sensitive information, we mean details about your health and health history, race, ethnicity, politics, religious or philosophical beliefs, sexual preferences, health, genetics or criminal record.

We might also collect biometric information for use with new technologies like voice or fingerprint recognition. This could happen as technology changes and evolves over time. Remember, this kind of information will only be collected with your permission, and we will only use it for the purpose for which you provided it.

## **Who works with Nyora Medical Centre:**

We may share your personal information within a wider group of professional service providers that may be; employees, contractors, colleagues, co-workers, case managers, allied health professionals or other parties reasonably expected to be included in the treatment of your case.

You may be referred for diagnostic tests such as pathology or radiology and our staff may consult with medical experts when determining your diagnosis or treatment. Our staff may also refer you to other health service providers for further treatment during and following your admission (for example, to a physiotherapist or outpatient or community health services).

Your dealing with Nyora Medical Centre may involve several stages and could involve other parties, such as anaesthetists or post-operative care providers. They may also require access to your personal information in order to provide their service to you.

In these circumstances, we have arrangements in place with our partners that limit their use or disclosure of your personal information to these purposes.

## **Outsourcing:**

We work with third parties to provide some types of support. They may have access to systems that include your personal information. These companies are subject to controls that protect your information from unauthorised use or disclosure, and limit their access to your personal information to the extent necessary to do their job.

## **Access to personal information from overseas:**

Some of the parties mentioned above may be located overseas. We only give them secure access to the information they need to do their job. These overseas companies are involved in providing services like data storage, data management and analytics, technical support, dictation, and they may be in countries such as USA, India, and the Philippines. They are businesses we have vetted, have a longstanding relationship with and are of professional standing.

Our practice maintains effective control of your information always by ensuring that parties located overseas are subject to strict controls that limit access and subsequent handling of your information to the extent strictly necessary to perform the relevant function and protect your information from unauthorised use and disclosure.

## **Outstanding payments:**

In some circumstances, we may need to refer or sell overdue debts to debt collectors or other companies. If we do this, we'll give them secure access to the personal information they need to handle the debt.

We may also update credit reporting agencies about some types of payment defaults, although we'll always tell you before we do this.

## **Legal obligations and other privacy exceptions:**

We give access to personal information where we are permitted or obliged to do so by Australian law.

When required, we will use or disclose personal information to react to unlawful activity, serious misconduct, or to reduce or prevent a serious threat to life, health or safety.

When Nyora Medical Centre receives an access request or warrant that is authorised under Australian law or in other ways where Nyora Medical Centre is obliged to cooperate with law enforcement bodies, we may disclose personal information, including information about phone calls and treatment.

## **Other Disclosure:**

We will only disclose personal information to others if you've given us permission, or if the disclosure relates to the main reason we collected the information and you'd reasonably expect us to do so.

## **Personal Communications:**

We may use your personal information to send information that Nyora Medical Centre feels is relevant.

It is Nyora Medical Centre belief that directly advising patients of relevant health developments or specific information that is brief, worthwhile and beneficial, can lead to better informed patients and can lead to improved health outcomes.

Nyora Medical Centre may use your personal information in communications using modalities such as mail, phone, email, text, and online via the internet and in apps. Nyora Medical Centre may also work with other companies to extend our communications online. Nyora Medical Centre works with them to understand the type of audience they want to communicate to, and deliver the messages to them.

## Opting out:

Nyora Medical Centre will make sure that any emails, texts and letters sent to you clearly tell you how to opt out, or you can tell our staff by return.

You can opt out of receiving online material at any time by clicking on the symbol displayed on the communication modality (email, text, online advertising). When you opt out, you can choose to opt out of direct communications, or all promotional communications.

Of course, there are some types of marketing we can't control on an individual basis, like general letterbox drops or online ads that are not targeted specifically to you.

## Credit related information:

Nyora Medical Centre may use your personal information to assess your credit situation when you apply for some services or products. We might ask you for information about yourself and things like your employment details and credit history, and then seek a credit report from a credit reporting agency.

Prior to this occurring, Nyora Medical Centre will always tell you before we seek a credit report and will not perform credit checks for patients under 18.

The credit report provided by a credit reporting agency may include information like your employment history, previous credit checks, any problems you've had paying bills and whether those issues were resolved. We use this information to assess whether entering an arrangement is sensible for both you and Nyora Medical Centre.

After you become a patient, we store the credit report information and our own credit assessment. We may continue to use this information to manage credit, and to make sure we're offering and providing the right services to you.

We don't use credit related information to generate marketing lists. Sometimes, we might ask a credit reporting agency to do that for us. You can ask the credit reporting agency not to use your information for these purposes by getting in touch with them directly.

We work with patient service partners inside and outside Australia on credit related matters. Where necessary, we give our partners access to the credit information they need to help manage credit and your services.

You can get access to credit related information we hold about you, ask us to correct it, or make a complaint, as described elsewhere in this policy. If Nyora Medical Centre agrees that our records need to be corrected, and Nyora Medical Centre has previously disclosed that information to a credit reporting agency or other persons, Nyora Medical Centre will communicate the correction.

You can ask the credit reporting agencies not to use or disclose the information in their files if you think you have been or are likely to become a victim of fraud.

## Security:

Your data security is important. We're committed to protecting your personal information. Some of the security measures we use include:

- ❖ Firewalls and access logging tools that protect against unauthorised access to your data and our network.
- ❖ Secure work environments and workflow systems that prevent unauthorised access and copying of your personal information.
- ❖ Secure server and closed network environments.
- ❖ Encryption of data in transit using SSL (128-bit encryption)
- ❖ Virus scanning tools.

- ❖ Management of access privileges, to ensure that only those who need it can see your personal information.

### **Ongoing training and security reviews:**

These measures are robust, but security risks do change. We will remain vigilant in our efforts to protect your personal information.

### **How to access your personal information:**

If you ask us, we will usually give you access to the personal information we hold about you. We will always confirm your identity before giving access to your personal information.

There are circumstances under Australian privacy laws where we may not give you access to the personal information we hold about you. In circumstances when the release of information will unreasonably affect someone else's privacy or if giving you access poses a serious threat to another's life, health or safety.

There is generally no cost for accessing the personal information we hold about you, unless the request is complex or resource intensive. If there is a charge, it will be reasonable and we will let you know what it is going to be so that you can agree to it before we go ahead.

### **Quality of personal information:**

We aim to keep the personal information we hold about you accurate, up-to-date and complete. If you think our records need to be corrected, please call us.

We encourage you to update your details with us so we can deliver better service to you, and so the others we work with (like emergency services) have access to the information they need to do their job.

### **Getting in touch:**

Nyora Medical Centre recognises that your personal information is important to you, so please let us know if you have any questions or concerns about this policy or our practices.

You can contact us by mail to the address on this website or on the telephone at the number listed. You can find out more about our complaint process and complaint handling policy by contacting the practice directly.

We will acknowledge receipt of your complaint, and try to investigate and respond to you within a reasonable time frame.

If you are unhappy with the outcome, you can lodge a complaint with the Health Care Complaints Commission (HCCC - <http://www.hccc.nsw.gov.au/>)

### **Changes:**

Nyora Medical Centre may amend this policy from time to time, this document was last amended in August 2019.