

# Wellness Medicine Privacy Policy

Current as of: 21/01/2025

## 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 (e.g. 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 from My Health Record or via shared Health Summary.
3. We may also collect your personal information when you visit our website, send us an email or SMS, telephone us or make an online appointment online.

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).
  - Through Hotdoc, which is a software program that allows us to provide online bookings and automate reminders and recalls for your healthcare. Please ensure you read the Hotdoc privacy policy. If you wish to opt out, please advise the receptionist and your appointments, recalls and reminders can be managed in an alternative manner.

## 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 (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)
- during the course of providing medical services, through eTP, My Health Record (e.g. 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.

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.

- as paper records,
- electronic records,
- visual records
- X-rays, CT scans, videos and photos

Our practice stores all personal information securely.

The practice holds all personal information securely in electronic format, in protected information systems held on servers on the premises which are secured by multilayered security and backup information held offsite in the cloud in secure servers by third parties.

Occasionally, our practitioners may need to access your health records remotely from their own devices to provide you with continuous care. When this occurs, access is via devices with firewall and antivirus software installed, and connected only to secure, private internet sources (e.g. not public WiFi).

All employees of Wellness Medicine are required to observe the obligations of confidentiality in the course of their employment and are required to sign Confidentiality Agreements.

## 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 timeframe (e.g. 14 days).

The following will apply with regard to accessing personal and private medical information by an individual:

- An individual has the right to request access to their own personal information and request a copy or part of the whole record;
- Individuals have the right to obtain their personal information in accordance with the Federal Privacy Act from 20 December 2001 onwards. Requests must be made in writing and an acknowledgement letter will be sent to the patient within 14 days confirming the request and detailing whether the request can be complied with and an indication of any costs associated with providing the information. Time spent and photocopying costs when processing a request can be passed on to the requesting patient. Information can be expected to be provided within 30 days;
- Whilst the individual is not required to give a reason for obtaining the information, a patient may be asked to clarify the scope of the request;
- In some instances the request to obtain information may be denied, in these instances the patient will be advised;
- The practice will take reasonable steps to correct personal information where it is satisfied they are not accurate or up to date. From time to time the practice will ask patients to verify the personal information held by the practice is correct and up to date. Patients may also request the practice corrects or updates their information and patients should make such requests in writing;
- Upon request by the patient, the information held by this clinic will be made available, as law permits, to another health provider or other third party.

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 [info@wellnessmedicine.com.au](mailto:info@wellnessmedicine.com.au).

## Website

Our practice does not collect or use any personal information on visitors via our website, through the use of 'cookies' or other software or hardware techniques. We look at the number of hits the website receives and keep track of the pages accessed and the documents downloaded from the website.

Our Internet Service Provider/Hosting Provider records website visitors that read or download information. Information recorded includes server address, domain name, the date and time of your visit to our website, the pages viewed, and the information downloaded. The information is used for statistical and website development purposes only.

## 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.

Complaints can be addressed to:

**Alan Fitzgerald**

Address: 41 Queens Parade, Clifton Hill 3068

Phone: (03) 9489 7955

Fax: (03) 9489 7944

Email: [info@wellnessmedicine.com.au](mailto:info@wellnessmedicine.com.au)

You will be contacted within three business days with an acknowledgement we have received your complaint. Our expected turnaround for complaints resolution is 30 days.

If the complaint has not been resolved to your level of satisfaction all complaints should be directed to the Office of the Australian Information Commissioner. Generally, the OAIC will require you to give them time to respond before they investigate.

**Phone:** 1300 363 992

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Fax:** +61 2 9284 9666

**Post:** GPO Box 5218 Sydney NSW 2001

**Website:** <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

## Policy review statement

The Practice Privacy Policy is reviewed annually to ensure it is in accordance with any changes that may occur and remains applicable to current practice procedure and legal requirements.