

Heal Focus Podiatry Privacy Policy

- 1) Australian Privacy Principles
 - a) Heal Focus Podiatry Pty Ltd as a trustee for T North & S Tilbrook Family Trust trading as Heal Focus Podiatry ABN 22 580 558 519 ("we", "our") are committed to maintaining the privacy and confidentiality of personal information. We believe that the responsible use of personal information collected is critical to our business objectives and reputation.
 - b) Our practice is subject to the Commonwealth Privacy Act 1988 and accordingly will adhere to the Australian Privacy Principles (APPs) when collecting, using, disclosing, securing and providing access to personal information.
 - c) As part of our commitment to privacy, we have adopted this Privacy Policy which deals with the management of personal information.
 - d) The contents of this Privacy Policy are subject to change and are not intended to create a contract between us and any individual or entity that provides us with personal information.
- 2) Personal Information Collection
 - a) "Personal information" is any information, including any opinion, about an identified individual, or an individual who is reasonably identifiable:
 - i) whether the information or opinion is true or not; and
 - ii) whether the information or opinion is recorded in material form or not.
 - b) "Sensitive Information" is personal information which is given a greater level of protection under the Australian Privacy Principles, such as information or an opinion about your health, racial or ethnic origin, political opinions and memberships, religious or philosophical beliefs, sexual orientation, criminal records, genetic information and biometric information. We only collect such information to the extent necessary to provide our services to you or where we are required to collect this information by law.
 - c) We may invite you to provide information about yourself so that we are able to provide our services to you. We may also collect information about you from Medicare and through referrals from medical clinics, GPs and other allied health care providers. We do not collect information about you from other external sources.
 - d) The extent and type of personal information we receive from you depends on the information you provide to us through our website, telephone, face-to-face meetings and/or when you request services and they type of services you request.
 - e) In order for us to properly administer our business and to provide you with our services or otherwise to deal with you we generally require your:
 - i) Name, date of birth, mailing and street address, email address, contact numbers;
 - ii) Health fund details and any identifiers such as a Medicare or private health number;
 - iii) Emergency contact name and contact details;
 - iv) Occupation and employer;
 - v) Lifestyle and hobbies;
 - vi) Bank, credit card details or other details necessary for billing;
 - vii) Details of products you have purchased both online and in person from us;
 - viii) Other health and information such as a record of matters discussed at a consultation or appointment which could include your symptoms, medical history, any diagnosis made, treatment advice, prescriptions, test results or information about your relevant family history;
 - ix) Other information for the purpose of providing services to you;
 - x) Any information that relates to you, that you provide to us directly through our website, email, written letters and phone conversations.
 - f) Where it is lawful and reasonable to do so, you can remain anonymous or use a pseudonym if you wish, however it may reduce the type and quality of services we will be able to provide.
- 3) Use and Disclosure of Personal Information
 - a) We use the personal information which you provide to deliver services most suited to your needs.
 - b) We use your personal information to:
 - i) communicate with you and respond to your requests;
 - ii) provide you with information about our services;
 - iii) provide you with services;
 - iv) administer and manage those services (including billing);
 - v) consult with your other health care providers;
 - vi) deal with Medicare and your insurer;
 - vii) market our services by promotional and educational material and invitations
 - viii) gather feedback on our services or our website;
 - ix) upload or download information from our practice management program or My Health Record; and
 - x) comply with any legal or regulatory obligations.
 - c) We may use your personal information to inform you about our other services from time to time, however, we will give you an opportunity to decline to receive such communications.

- d) The personal information you provide to us will be retained only for as long as necessary to fulfil the purposes for which the information was collected or as required by law.
 - e) We do not share personal information with third parties except as set out below or otherwise as necessary to provide our services or as required by law or other legal processes, and we never sell your personal information.
 - f) The third party people/organisations to which we disclose your personal information where necessary may include our outsourced service providers (Cliniko, GoFax, Gmail and our virtual reception service provider) who manage the services we provide to you, Medicare, your insurer, your other health care providers, your authorised representatives, our professional advisers (including our accountants and auditors), government and regulatory authorities and other similar organisations, as required or authorised by law.
 - g) We will release information about you to comply with any valid legal inquiry or process such as a search warrant, subpoena, statute or Court order.
 - h) By submitting information online through our website or email you know that information can be collected and used by third parties including our virtual reception service provider. Although we strive to protect your privacy, we cannot guarantee the security of information you post in these forums. You disclose such information at your own risk.
- 4) Data Access and Quality
- a) We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date.
 - b) You can request access to the personal information we hold about you if you wish to do so by contacting us via email, phone or in person. If we are unable to provide you with access, we will explain why. We reserve our rights to charge a fee for searching for and providing access to your information.
 - c) You can contact us at any time via email, phone or in person to update your information and we recommend you do so as and when required.
- 5) Cookies
- a) "Cookies" (small text files placed on your computer when you first visit our website) may be used on some parts of our website. Most browsers now recognise when a cookie is offered and permit you to refuse or accept it. If you are not sure whether your browser has this capability, you should check with the software manufacturer, your company's technology help desk or your internet service provider.
 - b) Cookies are primarily used to enhance your online experience and are not used to track the navigational habits of identified visitors, unless we obtain your permission to do so. If you visit our website to read or download content, much of the information we do collect via cookies is statistical only (for example the domain from which you access the internet, the date and time you access our site, and the internet address of the website from which you linked directly to our site) and is not personally identifiable. We use this information about the number of visitors and their use of the sites in aggregate form to make our site more useful and attractive to users.
- 6) Overseas Transfer
- a) We use cloud-based software services for our practice management (Cliniko) and email (Gmail) as well as a virtual reception service provider each of which rely on servers in various locations including overseas. This means that your personal information, may be transferred overseas for the purpose of storage on servers. If you elect to provide personal information to us you are deemed to consent to the overseas transfer of such information.
 - b) Apart from the above we will only transfer your personal information overseas if:
 - i) we are required to do so by law;
 - ii) we reasonably believe that the recipient will be required to uphold privacy principles which are similar to the Australian Privacy Principles;
 - iii) you have consented to the transfer;
 - iv) it is not practical to obtain your consent or the transfer is for your benefit and your consent is likely to be given;
 - v) the transfer of the information is necessary for the performance of a contract between you and us; or
 - vi) we have taken reasonable steps to ensure that your personal information will not be held, used or disclosed by the overseas recipient in a way which does not comply with the Privacy Act and/or the APPs.
- 7) Data Security
- a) We are committed to protecting your personal information from misuse and loss, and from unauthorised access, modification and disclosure, and will take reasonable steps to do so.
 - b) Our personnel who have access to personal information have been trained to maintain the confidentiality of such information.
- 8) Further Information
- a) We recognise our responsibility for protecting the privacy of your personal information. If you have a complaint about our administration of your personal information, please contact us at info@healfocuspodiatry.com.au. You may also use this address to communicate any questions or comments you may have regarding compliance with our Privacy Policy. Any complaints should follow the template provided by the Office of the Australian Information Commissioner which we will review and provide a response within 30 days.
 - b) If you are not satisfied with how we handled your complaint, you can lodge a complaint with us or with the Office of the Australian Information Commissioner at:
 - Telephone 1300 363 992
 - Post GPO Box 5218 Sydney NSW 2001
 - Facsimile +61 2 9284 9666

Email enquiries@oaic.gov.au
Website www.oaic.gov.au