



Privacy Policy – 15/7/26

1 Introduction

Heal Focus Podiatry Pty Ltd as trustee for T North & S Tilbrook Family Trust trading as Heal Focus Podiatry ABN 22 580 558 519 (“we”, “our”, and “us”) is committed to maintaining the privacy and confidentiality of personal information. This Privacy Policy is to provide information to you on how your personal information (which includes your sensitive information, including your health information) is collected and used within our practice, and the circumstances in which we may share it with third parties. 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 Why and how your consent is necessary

When you register as our patient, you provide consent for us (including our employees, agents, contractors and other representatives) to access and use your personal information so that the podiatrists and other staff working in our practice can provide you with the best possible podiatry goods and services and so that others who provide healthcare, homecare or support services to you have access to information about your health and healthcare needs where it is necessary or appropriate for those third parties to collect and hold that information. Only persons who need to see your personal information will have access to it. If we need to use your information for any other purposes, we will seek additional consent from you to do so.

3 Why we do collect, use, hold and share your personal information

We will need to collect your personal information to facilitate the provision of podiatry services to you by our staff. Our main purpose for collecting, using, holding and sharing your personal information is to facilitate the management of your health by our staff. 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).

4 What personal information do we collect?

The information we will collect about you includes your:

- (a) names, date of birth, addresses, contact details including emergency contact and next of kin;
- (b) demographic information, including gender, and cultural background;
- (c) medical information including medical history, medications, allergies, and adverse events, family history and risk factors;
- (d) Medicare number (where available) for identification and claiming purposes;
- (e) healthcare identifiers;
- (f) payment and/or financial information;
- (g) concession card details; and

- (h) health fund details.

5 Dealing with us anonymously

- 5.1 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.
- 5.2 Please be aware that Medicare rebates are only available where a Medicare card (and/or associated information) is available. As such, we may require you to pay for your consults in full without this rebate if you choose to deal with us anonymously or under a pseudonym.

6 How do we collect your personal information?

- 6.1 We may collect your personal information in several different ways:
 - (a) You may provide us with your personal information directly (for example, when you make an appointment with us, our practice staff will collect your personal and demographic information via your registration and our New Patient Information Form).
 - (b) Our staff members providing podiatry services may also collect further personal information from you which may be disclosed to us. Information can also be collected through My Health Record, e.g. via Shared Health Summary, Event Summary or through a Discharge Summary provided by a hospital or other healthcare service providers.
 - (c) We may also collect your personal information when you contact us via our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media.
 - (d) 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:
 - (i) your guardian or responsible person.
 - (ii) other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services;
 - (iii) the providers of support services to you (such as NDIS providers or homecare providers); and/or
 - (iv) your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).
 - 6.2 If your podiatrist deems it in your best interest to discuss your clinical information with you, we will arrange for this to occur either in person, via telephone or via video conference.
- ## **7 When, why and with whom do we use and share your personal information?**
- 7.1 We collect, use and disclose your personal information to facilitate the provision of podiatry services to our patients.
 - 7.2 We may also share your personal information:
 - (a) with other healthcare providers (including allied health providers and any provider who has written a referral for you);

- (b) with the providers of support services to you (such as NDIS providers or homecare providers);
- (c) when it is required or authorised by law (e.g. court subpoenas, or where we are obliged to make a mandatory notification to a regulatory body);
- (d) 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 where it is otherwise impractical to obtain your consent;
- (e) to assist in locating a missing person;
- (f) to establish, exercise or defend a claim;
- (g) for the purposes of confidential dispute resolution processes;
- (h) for the purposes of uploading that information to your My Health Record, such as through the shared health summary or event summary;
- (i) to third parties who provide services to us from time to time including our practice software provider Cliniko, Clinqapps, Adobe Acrobat, Tyro/Medipass, GoFax, Xero, our outsourced virtual receptionists and Mailchimp; and/or
- (j) with third parties who work with our practices for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with the Australian Privacy Principles (**APPs**) and this policy.

- 7.3 Only people who need to access your information will be able to do so. Other than in the course of facilitating the provision of podiatry goods or services or as otherwise described in this policy, we will not share personal information with any third party without your consent.
- 7.4 We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent, other than with our third party information technology and software providers and outsourced suppliers of services to us (see paragraph 7.2(i) above) who are offshore for the purpose of facilitating the provision of goods and services by your podiatrist. Information technology and software providers and the suppliers of services to us may be based in the United States of America or globally. Where information is sent offshore, we and our offshore contractors and agents will continue to adhere to the APPs and other privacy requirements.
- 7.5 We will use your personal information for marketing our goods or services directly to you and by registering as a patient with us you are providing your express consent to us doing so. You may opt out of direct marketing at any time by notifying us in writing.
- 7.6 We may use an artificial intelligence program to record and summarise your appointment and store the transcript of the appointment in your medical record. If this occurs, we will seek your consent prior. These notes will be reviewed by your podiatrist to ensure they accurately reflect your appointment before they are relied upon to provide advice.
- 7.7 We cannot make any warranties or guarantees on how third parties will collect, store, or use data. Where there has been a breach of privacy by the third-party due to their own conduct, we will not be liable for any damages of any kind recognised by law and our liability is limited to the extent of our negligence or misconduct contributing to the breach. We will participate in updating you if needs be in relation to any communications from the third-party with us in connection with any breach of privacy committed by the third-party. Any complaints regarding third-party programs should be sent to the third-party.

8 How do we store and protect your information?

- 8.1 Your personal information may be stored at our practice in various forms.
- 8.2 Our practice stores information as electronic records (including via cloud-based services), and archived paper records.
- 8.3 Our practice stores all personal information securely in electronic format, in a protected system or in hard copy format in a secured environment. Each staff member and contractors are provided with their own passwords for systems with additional use of 2 host authentication. All physical and cloud servers based in Australia, the United States of America and globally via the use of passwords, encrypted back-ups, confidentiality agreements for Australian employees and secure cabinets.
- 8.4 All records will be retained until the later of 7 years from your last contact with the practice, or until you reach the age of 25 years.
- 8.5 We take steps to destroy or de-identify information that we no longer require.
- 8.6 We do not store or hold your credit card or other payment method details.

9 How can you access and correct your personal information at our practices?

- 9.1 You have the right to request access to, and correction of, your personal information.
- 9.2 Our practice acknowledges patients may request access to their medical records. You can lodge this request either via email (info@healfocuspodiatry.com.au) or telephone. Our practice will acknowledge your request within 5 business days. We can post the requested information to your postal address, or we can email the information to you if you request it. If we are required to process a request for your records, we may charge for our reasonable costs incurred in complying with your request.
- 9.3 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 practices are correct and current. You may also request that we correct or update your information, and you should make such requests in writing to info@healfocuspodiatry.com.au. There is no fee charged for making corrections to your personal information.

10 How can you lodge a privacy related complaint, and how will the complaint be handled at our practices?

- 10.1 We take complaints and concerns regarding privacy seriously. You should express any privacy concerns (including any breach of the APPs or any registered binding APP code) you may have in writing.
- 10.2 Complaints should be addressed to:
 - (a) Name and Position: The Director, Heal Focus Podiatry, Shop 3/73 Partridge Street, Glenelg South, South Australia, 5045
 - (b) Email: info@healfocuspodiatry.com.au
- 10.3 We will respond with acknowledgement of your complaint within 3 business days and provide a response within 30 business days.
- 10.4 You may also contact the Office of the Australian Information Commissioner (**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 363 992.

11 Privacy and our website

- 11.1 If you 'like' or comment on our social media pages, we will have your social media name.
- 11.2 Our website may contain links to third-party websites. We are not responsible for the content or privacy practices of websites that are linked from our website.