

PVH Medical patient privacy policy

Current as of 20 October 2018

Introduction

This privacy policy provides 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.

We are committed to protecting the privacy of your information and to handling your personal information in a responsible manner in accordance with the Privacy Act 1988, the Privacy Amendment (Enhancing Privacy Protection) Act 2012, the Australian Privacy Principles and relevant Victorian privacy legislation (referred to as privacy legislation).

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.

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 Medicare claims and payments, practice audits and accreditation, and business processes (e.g. staff training). With your permission we will also use it to keep you informed about our services.

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) or healthcare identifier, for identification and claiming purposes
- health fund details, where applicable.

How do we collect your personal information?

Our practice may collect your personal information in several different ways.

1. Wherever practicable, we will only collect information from you personally. When you make your first appointment our practice staff will collect your personal and demographic information via your new patient registration form.
2. During the course of providing medical services, we may collect further personal information. This might include information from other sources such as treating specialists, radiologists, pathologists, hospitals, other health care providers, and the myHealth record system.
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. This is further explained below.
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 relatives or friends in emergency situations
 - your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

When, why and with whom do we share your personal information?

We will treat your personal information as strictly private and confidential. We will only use or disclose it for purposes directly related to your care and treatment, or in ways that you would reasonably expect that we may use it for your ongoing care and treatment (for example, the disclosure of blood test results to your specialist).

There are circumstances where we may be permitted or required by law to disclose your information to third parties. We sometimes share your personal information:

- with other healthcare providers, including specialists and allied health
- to Medicare, regarding entitlements and payments
- 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 a serious threat to public health or public safety,
- with insurers,
- 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 My Health Record (e.g. via Shared Health Summary)
- with third parties who work with our practice for business purposes, such as accreditation agencies or information technology providers. Outside contractors are required not to use information about you for any purpose except for those activities we have asked them to perform.

Other than in the course of providing medical services or as otherwise described in this policy, our practice will not share identifiable personal information with any third party without your consent.

Occasionally the information held by the practice may be used in research projects to improve healthcare in the community; however, this information will not include data that can identify you.

We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

How do we store and protect your personal information?

Personal information that we hold is protected by:

- securing our premises;
- placing passwords and varying access levels on computers and databases to limit access and protect electronic information from unauthorised interference, access, modification and disclosure; and
- providing locked cabinets and rooms for the storage of physical records.

PVH Medical requires its doctors, employees and contractors to observe obligations of confidentiality, and all staff/contractors have signed a Confidentiality Agreement.

Corrections

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. If you need to change your contact details, please let us know.

How can you access your personal information at our practice?

You are entitled to request access to your medical records. You will need to put your request in writing by filling in a *Personal Health Information Request Form* which outlines the type of information being requested, and in what format you would like to receive the information. We will respond to it within a reasonable time, of not more than thirty days.

There will be a fee for the administrative costs of retrieving and providing you with copies of your medical records.

We may deny access to your medical records in certain circumstances permitted by law, for example, if disclosure may cause a serious threat to your health or safety. We will always tell you why access is denied and the options you have to respond to our decision.

Privacy, our website & social media

Your privacy is important to us and we want you to feel comfortable visiting our website. Please note the following:

- PVH Medical’s website contains links to other sites. PVH Medical is not responsible for the privacy practices of any linked sites. The information, products and advertisements contained in the linked sites are neither approved nor endorsed by PVH, and PVH is not responsible for such information, products or advertisements.
- We use cookies to monitor the usage and improve the performance of our website. (A cookie is a small text file attached to your web browser that can track your internet activity). The information collected during this process does not include personal identifiers. We may share this information with third parties for website maintenance and development purposes. You can manage the use of cookies in your internet browser.
- We use Google Analytics on our website to collect information about how you use our website and to provide you with information about services we think will interest you. This information is provided to us as aggregated data and does not include personal information. Google Analytics uses cookies to collect information about you, such as your device, your location and the webpages you visit. Google shares information it collects with affiliates within the Google group of companies and other third parties. The manner in which Google collects, stores and discloses information is detailed in the Google Privacy Policy. You can opt out by downloading and installing the Google Analytics opt-out browser add-on.
- We may use remarketing or retargeting platforms, such as Google and Facebook, to advertise our services to you. For Google remarketing, cookies are used to show you ads on Google and other websites based on your past visits to our website. For Facebook retargeting (Custom Audiences), your personal information is encrypted and matched with Facebook’s encrypted data to serve you advertising on Facebook and its associated websites. Your medical records are not shared with Google or Facebook. You can opt out by visiting Google’s Ads Settings page, Facebook’s Settings page or the third party advertiser’s equivalent page.
- We use social media sites such as Facebook and YouTube to keep you informed about our services. We discourage you from providing personal information to us in public forums. Social media sites also use cookies to collect data; the collection, storage and disclosure of personal information is subject to the privacy policy of the site provider.
- We use MailChimp to provide electronic newsletters about PVH Medical (see below). In distributing newsletters, MailChimp will collect personal information, including the email address you have provided and all information relating to that email address. MailChimp is based in the United States of America. Your information (including your IP address) will be transmitted to and stored by MailChimp on servers located outside Australia. This means that Australian Privacy principals and legislation do not apply (but USA laws do). You can refer to MailChimp’s Privacy Policy and Terms of Use for further information including their undertakings to members located in Australia.

Direct marketing materials

We use direct marketing to contact you for the purposes of promoting our services. We engage third party providers to assist us with delivering direct marketing and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS and email. We take all reasonable steps to ensure that our service providers treat your personal information with the same level of privacy and protection as we do. At any time you may opt-out of receiving marketing communications from us by contacting us or by using opt-out facilities provided in the marketing communications.

Online bookings

If you choose to make an online booking via Appointuit (on a computer or app), you are bound by the Appointuit Privacy Policy. By opting in to Appointuit you are consenting to the collection of personal information for the purpose of being linked with us. You can unsubscribe from receiving emails by clicking on the unsubscribe link in the email. You can delete the app at any time from your device. To unsubscribe from Appointuit SMS messages, please contact us directly.

How can you lodge a privacy-related complaint, and how will it be handled?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing. Upon receipt of a complaint we will consider the details and attempt to resolve it in accordance with our complaints handling procedures. The practice also has additional requirements under the **Notifiable Data Breaches (NDB) scheme** that requires us to notify you, and the *Office of the Australian Information Commissioner (OAIC)* if there is an 'eligible data breach'. Eligible data breaches are those that occur when *i)* there is unauthorised access, disclosure or loss of personal information that we hold, AND *ii)* this is likely to result in serious harm AND *iii)* we have not been able to take action to prevent the likely risk of harm.

If you are dissatisfied with our handling of a complaint or the outcome you may make an application to:

- the Office of the Australian Information Commissioner (OAIC). For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992, or
- Victorian Health Complaints Commissioner. For further information visit www.hcc.vic.gov.au or call 1300 582 113

Contact

Please direct any queries, complaints or initial requests for access to medical records at PVH Medical, to:

Dhanya Venogopalan, Executive Assistant at PVH Medical.

124 Kent Rd, Pascoe Vale

phone 9304 0500

info@pvhmedical.com.au

Policy review statement

This Privacy Policy is reviewed annually. From time to time we may make changes to our policy, processes and systems in relation to how we handle your personal information. We will update this Privacy Policy to reflect any changes. Those changes will be communicated on our website and in the practice.