

Privacy Policy

1 General

- 1.1 This Privacy Policy applies to all Personal Information collected by Hills Medical Pty Ltd ACN 603 549 926, trading as Better Medical (**Better Medical**). Better Medical is committed to complying with its obligations under the *Privacy Act 1988 (Act)* and the Australian Privacy Principles (**APP**) in respect of that information. In this policy, we explain how and why we collect your information, how we use it, and what controls you have over our use of it.
- 1.2 In this Privacy Policy:
- (i) "OAIC" means the Office of the Australian Information Commissioner;
 - (ii) "Personal Information" has the meaning given to that term in the Act;
 - (iii) "Sensitive Information" has the meaning given to that term in the Act;
 - (iv) "Services" means the health care services that are to be provided by Better Medical from time to time;
 - (v) "we", "us" or "Better Medical" means Hills Medical Pty Ltd 603 549 926, a proprietary limited company incorporated in South Australia, Australia trading under the name Better Medical and its associated entities as appropriate;
 - (vi) "Website" means "Website" means <http://bettermedical.com.au/> or any other website from time to time from which the Services are promoted and/or delivered; and
 - (vii) "you" means you and anyone acting on your behalf or with your implied authority.
- 1.3 Please read this Privacy Policy carefully. Your use of any part of our Website or Services will constitute your consent to the collection, transfer, processing, storage, disclosure and other uses of your Personal Information in accordance with this Privacy Policy. If you do not agree with the terms and conditions of this Privacy Policy, please do not use our Website or Services.

2 What personal information do we collect?

- 1.4 We collect and hold various types of Personal Information, including:
- (i) personal details, including name and date of birth;
 - (ii) contact details, including your email address, mailing address and telephone number;
 - (iii) financial information, including banking details, billing and payment details;
 - (iv) Sensitive Information, including health information, medical history, family history and the details and results of tests provided by you in conjunction with the Services at our health clinics or previously provided to you at other health clinics;
 - (v) Information necessary for or incidental to the provision of the Services;
 - (vi) Medicare and private healthcare information; and
 - (vii) Family contact information; or



- (viii) any other Personal Information that may be required in order to facilitate your dealings with us.

3 How do we collect personal information?

3.1 We may collect Personal Information from you when:

- (ix) you register as a patient of our practice and complete and submit documentation;
- (x) you communicate with us through via email, telephone, SMS or social media or make an online appointment;
- (xi) you interact with our Website;
- (xii) you communicate with our medical practitioners, staff or representatives during the course of providing the Services (including information collected through Electronic Transfer of Prescriptions (eTP), MyHealth Record/PCEHR system, e.g. via Shared Health Summary, Event Summary); and
- (xiii) you otherwise deal with us in the course of our business.

(b) We may also collect Personal Information from third parties, including:

- (i) your guardian or responsible person;
- (ii) other health care providers such as specialists, allied health professionals, hospitals, community health services, pathologists and diagnostic imaging services;
- (iii) your private health insurer;
- (iv) credit reporting agencies;
- (v) law enforcement agencies; and
- (vi) government agencies (such as Centrelink, Medicare, Department of Social Services, National Disability Insurance Agency, Department of Veterans Affairs, and other government agencies responsible for home care services).

3.2 Where we solicit Personal Information, we only collect:

- (i) non-Sensitive Information, if it is reasonably necessary for the services we provide; and
- (ii) Sensitive Information, if it is reasonably necessary for or directly related to services we provide and you have consented to its collection, or its collection is permitted or authorised by law.

3.3 If we solicit Personal Information, we will generally solicit it directly from you, unless it is unreasonable or impracticable for us to do so. Where we collect Personal Information about you from a third party without your prior consent, we will take reasonable steps to inform you that we have collected Personal Information.

3.4 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 with identified individuals.



4. How we store and protect personal information?

- 4.1 We prioritise the security of your Personal Information whilst it is in our possession.
- 4.2 We may hold Personal Information in various forms, including but not limited to physical documents, electronic records, visual records (X-rays, CT scans, videos and photos) and audio recordings. Physical files are kept securely inside our access controlled premises. Electronic files are stored securely on protected information systems and are only accessible through our secure network. We maintain physical security over our paper and electronic data stores, and confidentiality agreements form part of the employment contracts for all of our staff members and contractors.
- 4.3 We take reasonable steps to:
- (i) ensure that Personal Information we collect is accurate, up-to-date, complete and relevant, other than where it is only collected to provide advice in respect of a particular point in time, in which case we will seek to ensure it is accurate, complete and relevant as at that particular point in time;
 - (ii) ensure that Personal Information we use or disclose is accurate, up-to-date, complete and relevant, having regard to the purposes for which Personal Information is used or disclosed;
 - (iii) protect Personal Information from misuse, interference and loss, and from unauthorised access, modification or disclosure; and
 - (iv) destroy or de-identify Personal Information which we no longer need for the purposes for which it was collected, except where it is necessary to retain it in order to maintain ongoing records for our clients.
- 4.4 We cannot guarantee the security of information transmitted via the internet. As such, transmission of Personal Information via the internet is at your own risk and we cannot be held responsible for the security of such information.

5. Why do we collect, hold, use and disclose personal information?

- 5.1 We may collect, hold, use and disclose your Personal Information for the following purposes:
- (i) for the purpose(s) for which it was disclosed to or collected by us;
 - (ii) for secondary purposes where it would be reasonable to expect us to do so, and that secondary purpose is related (or directly related in the case of Sensitive Information) to the primary purpose for which it was collected;
 - (iii) for any other purposes for which you have consented from time to time.
- 5.2 The above purposes include using and disclosing your Personal Information:
- (i) to supply the Services to you or facilitating other interactions with you in the course of operating our business;
 - (ii) to share your Personal Information to employees, contractors or other third party service providers of Better Medical to assist us with providing the Services;
 - (iii) to third party health care providers;
 - (iv) to respond to your enquiries and provide you with relevant information;
 - (v) to process authorised payments;
 - (vi) to update your Personal Information;



- (iii) to collect information required for reporting to relevant regulatory bodies;
- (iv) as permitted or required by law; and
- (v) for any other uses identified at the time of collecting your Personal Information.

5.3 We may also share your Personal Information:

- (i) 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;
- (ii) 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;
- (iii) to assist in locating a missing person;
- (iv) to establish, exercise or defend an equitable claim;
- (v) for the purpose of confidential dispute resolution process;
- (vi) when there is a statutory requirement to share certain Personal Information (e.g. some diseases require mandatory notification); and
- (vii) during the course of providing medical services, through Electronic Transfer of Prescriptions (ETP), MyHealth Record/PCEHR system (e.g. via Shared Health Summary, Event Summary).

5.4 If we engage third party contractors to perform services for us which involves handling Personal Information, we take reasonable steps to prohibit the contractor from using Personal Information except for the purposes for which it was supplied.

6. Do we use your Personal Information for communications?

6.1 We will only send you direct marketing communications and information via mail, email and social media platforms about our Services with your consent. If you do not provide your consent to receive direct marketing communications, you may opt-out of receiving marketing communications from us by contacting us at the details below or by using opt-out facilities provided in our communications. We do not provide your Personal Information to other organisations for the purposes of their direct marketing.

7. Overseas disclosure

7.1 It is unlikely that we will need to disclose your Personal Information to an overseas recipient or otherwise store your Personal Information overseas.

7.2 If we are ever required to do so, we will obtain your informed consent or ensure that the overseas recipients comply with the APPs.

8. Using our website and cookies

8.1 To improve your experience on our website, we may use 'cookies': small data files that are served by our platform and stored on your device. These are used by us or third parties for a variety of purposes including to operate and personalise the website. Cookies may be used for recording preferences, conducting internal analytics, conducting research to improve our offering, assisting with marketing and delivering certain website functionality.



- 8.2 You may refuse to accept cookies by selecting the appropriate setting on your internet browser. However, please note that if you do this, you may not be able to use the full functionality of our website.

9. Third party links

- 9.1 For your convenience and to improve the usage of the Website and Services we may insert links to third-party websites, applications or resources, for which this Privacy Policy does not apply.
- 9.2 Better Medical is not responsible for those third party websites, applications or resources. If you access such websites, applications or resources, you do so at your own risk and we make no representations or warranties regarding third parties' privacy practices. We encourage you to read the privacy statements/policies of every website, application or resource you use.
- 9.3 When we do link to a third party website, application or resource, this does not automatically imply that Better Medical endorses that website, application, resource and their contents.
- 9.4 Our Privacy Policy does not cover the use of cookies by any third parties.

10. Accessing or correcting your Personal Information

- 10.1 We are committed to maintaining accurate, timely, relevant and appropriate information.
- 10.2 Where requested, we will provide you with a copy of the Personal Information that we hold which relates to you, provided that the request is made in accordance with the APPs (contained in the Act). We will also update any inaccurate information about you if you inform us that the information is inaccurate, out of date, incomplete, irrelevant or misleading.
- 10.3 There are no charges for requesting access to or the correction of your Personal Information, however if the volume of information we hold is excessively large, we reserve our rights to charge you any reasonable administration fees (including fees for photocopying) associated with your request.
- 10.4 You can contact our privacy officer regarding access to or correction of your information by any of the following methods:
Email: privacy@bettermedical.com.au
Post: Level 2, 104 Frome Street, Adelaide SA 5000
Phone: 08 7228 0076
- 10.5 We will respond to those requests within 30 days in accordance with our obligations under the Act. If we refuse a request to access or correct Personal Information, where reasonable, we will provide you our reasons for doing so and information about your ability to complain about such refusal.
- 10.6 In order to protect the confidentiality of your Personal Information, details of your information will only ever be passed on to you where we are satisfied that the information relates to you. Accordingly, we may request documentation from you which confirms your identity before passing on any Personal Information which relates to you.

11. Making a complaint

- 11.1 If you have a complaint about our Privacy Policy or the collection, use, disposal or destruction of your Personal Information, your complaint should be directed in the first instance to our privacy officer at the details set out above.
- 11.2 We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of Personal Information held by us about you in accordance with the Act. If you are not satisfied with the outcome of this process, then you may contact the OAIC.

12. Privacy Policy changes

- 12.1 We may change this Privacy Policy at our discretion. If we do so, the latest version of our privacy policy will be available on our website and it will apply to all your Personal Information held by us at that time.



13. Further information

- 13.1 If you require any further information or have any queries regarding our Privacy Policy, please contact our privacy officer at the details set out above.
- 13.2 Should you wish to read more information on the Act, we recommend that you visit the website of the OAIC at www.oaic.gov.au.

Policy History and Document Control

Policy or procedure title	Privacy Policy
Effective date	16 August 2019
Issue date	16 August 2019
Authorised by	Head of Workforce Design and Capability
Version	1