

## **NMENT Privacy Policy**

### **Privacy Policy 1.2**

**27/01/2023**

NMENT Medical Practice Privacy Policy

This Policy covers Williamstown ENT & North Melbourne ENT under <https://www.nment.com.au>

#### **1. Introduction**

Our practice is committed to best practice in relation to the management of information we collect. This practice has developed a policy to protect patient privacy in compliance with the Privacy Act 1988 (Cth) ('the Privacy Act'). Our policy is to inform you of:

- the kinds of information that we collect and hold, which, as a medical practice, is likely to be 'health information' for the purposes of the Privacy Act;
- how we collect and hold personal information;
- the purposes for which we collect, hold, use and disclose personal information;
- how you may access your personal information and seek the correction of that information;
- how you may complain about a breach of the Australian Privacy Principles and how we will deal with such a complaint;
- whether we are likely to disclose personal information to overseas recipients;

#### **2. What kinds of personal information do we collect?**

The type of information we may collect and hold includes:

- Your name, address, date of birth, email and contact details
- Medicare number, DVA number and other government identifiers, although we will not use these for the purposes of identifying you in our practice
- Other health information about you, including:
  - notes of your symptoms or diagnosis and the treatment given to you
  - your specialist reports and test results
  - your appointment and billing details
  - your prescriptions and other pharmaceutical purchases
  - your dental records
  - your genetic information
  - your healthcare identifier
  - any other information about your race, sexuality or religion, when collected by a health service provider.

#### **3. How do we collect and hold personal information?**

We will generally collect personal information:

- from you directly when you provide your details to us. This might be via a face to face discussion, telephone conversation, registration form or online form
- from a person responsible for you
- from third parties where the Privacy Act or other law allows it - this may include, but is not limited to: other members of your treating team, diagnostic centres, specialists, hospitals, the My Health Record system<sup>1</sup>, electronic prescription services, Medicare, your health insurer, the Pharmaceutical Benefits Scheme

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<sup>1</sup> See: <https://myhealthrecord.gov.au/internet/mhr/publishing.nsf/content/home>

#### **4. Why do we collect, hold, use and disclose personal information?**

In general, we collect, hold, use and disclose your personal information for the following purposes:

- to provide health services to you
- to communicate with you in relation to the health service being provided to you
- to comply with our legal obligations, including, but not limited to, mandatory notification of communicable diseases or mandatory reporting under applicable child protection legislation.
- to help us manage our accounts and administrative services, including billing, arrangements with health funds, pursuing unpaid accounts, management of our ITC systems
- for consultations with other doctors and allied health professional involved in your healthcare;
- to obtain, analyse and discuss test results from diagnostic and pathology laboratories
- for identification and insurance claiming
- If you have a My Health Record, to upload your personal information to, and download your personal information from, the My Health Record system.
- Information can also be disclosed through an electronic transfer of prescriptions service.
- To liaise with your health fund, government and regulatory bodies such as Medicare, the Department of Veterans' Affairs and the Office of the Australian Information Commissioner (OAIC) (if you make a privacy complaint to the OAIC), as necessary.

#### **5. How can you access and correct your personal information?**

You have a right to seek access to, and correction of the personal information which we hold about you.

For details on how to access and correct your health record within the NMENT systems, please contact our practice as noted:

North Melbourne

Address: 100/30 Wreckyn St, North Melbourne VIC 3051

Phone: (03) 9078 8074

Fax: (03)9078 8105

Williamstown

Address: 54 Electra Street, Williamstown VIC 3016

Phone: (03) 9397 5507

Fax: (03)9397 6914

We will normally respond to your request within 30 days.

#### **6. How do we hold your personal information?**

Our staff are trained and required to respect and protect your privacy. We take reasonable steps to protect information held from misuse and loss and from unauthorised access, modification or disclosure. This includes:

- Holding your information in secure cloud storage
- Holding your information on cloud servers in Australia
- <https://nment.com.au> is a secure website with up to date security certificates including Information you send or get through the site is private.
- <https://nment.com.au>
- There is a single point of access to the website infrastructure - there is a displaced approach to the identification and management of information security risk across the website
- There is an appropriate security architecture that maintains a structure and consistent approach to information security
- Monitor systems and investigating all detected security breaches and weaknesses
- Ensure all legal, regulatory and contractual requirements are met

## **7. Privacy related questions and complaints**

If you have any questions about privacy-related issues or wish to complain about a breach of the Australian Privacy Principles or the handling of your personal information by us, you may lodge your complaint in writing to (see below for details). We will normally respond to your request within 30 days.

If you are dissatisfied with our response, you may refer the matter to the OAIC:

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>

## **8. Anonymity and pseudonyms**

The Privacy Act provides that individuals must have the option of not identifying themselves, or of using a pseudonym, when dealing with our practice, except in certain circumstances, such as where it is impracticable for us to deal with you if you have not identified yourself.

## **9. Overseas disclosure.**

We may disclose your personal information to the following overseas recipients:

- any practice or individual who assists us in providing services (such as where you have come from overseas and had your health record transferred from overseas or have treatment continuing from an overseas provider)
- anyone else to whom you authorise us to disclose it

## **10. Updates to this Policy**

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and other necessary developments. Updates will be published on the practice's website.

## **11. Privacy and websites**

This Privacy Policy describes how your personal information is collected, used, and shared when you visit [nment.com.au](http://nment.com.au) (the "Site").

### **PERSONAL INFORMATION WE COLLECT**

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as "Device Information".

We collect Device Information using the following technologies:

- "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- "Log files" track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- "Web beacons", "tags", and "pixels" are electronic files used to record information about how you browse the Site.

Additionally when you fill out a form or attempt to fill out a form through the Site, we collect certain information from you, including your name, billing address, payment information (including credit card numbers), email address, and phone number. We refer to this information as “Form Information”.

When we talk about “Personal Information” in this Privacy Policy, we are talking both about Device Information and Form Information.

#### HOW DO WE USE YOUR PERSONAL INFORMATION?

We use the Form Information that we collect generally to fulfill any requests placed through the Site (including organising appointments, processing information, and providing you with invoices and/or confirmations). Additionally, we use this Order Information to:

- Communicate with you;
- Screen our appointments for potential risk or fraud; and
- When in line with the preferences you have shared with us, provide you with information or advertising relating to our services.

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our users browse and interact with the Site, and to assess the success of our website functionality).

#### SHARING YOUR PERSONAL INFORMATION

We share your Personal Information with third parties to help us use your Personal Information, as described above. For example, we use Wordpress to power our website. We also use Google Analytics to help us understand how our customers use the Site — you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

#### BEHAVIOURAL ADVERTISING

We do not currently conduct any advertising based on your Personal Information that provides you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative’s (“NAI”) educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising by using the links below:

- Facebook: <https://www.facebook.com/settings/?tab=ads>
- Google: <https://www.google.com/settings/ads/anonymous>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance’s opt-out portal at: <http://optout.aboutads.info/>.

#### DO NOT TRACK

Please note that we do not alter our Site’s data collection and use practices when we see a Do Not Track signal from your browser.

#### DATA RETENTION

When you fill out a form through the Site, we will maintain your Form Information for our records unless and until you ask us to delete this information.

#### CHANGES

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

#### CONTACT US

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by email or by mail using the details provided below:

North Melbourne ENT

[Re: Website Privacy Compliance Officer]

North Melbourne

Address: 100/30 Wreckyn St, North Melbourne VIC 3051

Phone: (03) 9078 8074

Fax: (03)9078 8105