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**Policy Owner:** Medical Director

**Policy authoriser:** Business Manager

## Privacy Policy

### 1. Introduction and Purpose

Northern Beaches Neurology is committed to protecting the privacy of the personal information and sensitive information which it collects and holds.

Northern Beaches Neurology must comply with the Australian Privacy Act 1988(Clth), and other privacy laws which govern the way in which organisations hold, use and disclose personal information.

The purpose of this policy is to explain:

- a) The kinds of information that Northern Beaches Neurology may collect about you and how that information is held.
- b) How Northern Beaches Neurology collects and holds personal information.
- c) The purposes for which Northern Beaches Neurology collects, holds, uses and discloses personal information.
- d) How you can access the personal information Northern Beaches Neurology holds about you and seek to correct such information; and
- e) The way in which you can complain about a breach of your privacy and how Northern Beaches Neurology will handle that complaint.

## **2. Collection and use of personal information**

### **2.1. Types of personal information collected by Northern Beaches Neurology**

Northern Beaches Neurology will only collect information which is necessary to facilitate the provision to you of health care services by a member of the Northern Beaches Neurology Team. This may include:

a) Patients

Northern Beaches Neurology collects information from you to facilitate the provision of health care services to you by members of the Northern Beaches Neurology Team. This includes collection personal information such as your name, address, your health history, family history, past and current treatments, lifestyle factors and any other information which is necessary to assist the health care team in providing appropriate care.

b) Contractors, including medical:

Northern Beaches Neurology collects information from you which includes you name, address, professional experience, qualifications and past employers and any other information which may be necessary to appropriately conduct, manage and oversee the Practice.

c) Job applicants:

Northern Beaches Neurology collects information from you which is necessary to assess and engage job applicants. This includes collecting personal information such as your name, address, professional experience, qualifications, references and past employers, and any other information which is necessary to process your job application.

### **2.2. How we collect personal information**

Northern Beaches Neurology will usually collect your personal information directly from you, however, sometimes we may need to collect information about you from third parties, such as:

- a) Another health service provider
- b) Past employers and referees; or
- c) Related entities such as the Hospital Clinic

We will only collect information from third parties where:

- d) You have consented to such collection;
- e) Such collection is necessary to enable us to facilitate the provision of appropriate health care services by associated care providers
- f) It is legally permissible for us to do.

### **2.3. How Northern Beaches Neurology uses your personal information**

Northern Beaches Neurology only uses your personal information for the purpose for which it was collected, unless:

- a) There is another purpose and that secondary purpose is directly related to the primary purpose, and you would reasonably expect, or Northern Beaches Neurology has informed you, that your information will be used for that secondary purpose;
- b) You have given your consent for your personal information to be used for a secondary purpose; or

For example, Northern Beaches Neurology may use your personal information to:

- a) Facilitate the provision of health care services to you by a team member within Northern Beaches Neurology
- b) Facilitate the provision of any ongoing health related services to you;
- c) Appropriately manage, conduct and oversee the Northern Beaches Neurology business, such as assessing insurance requirements, conducting audits, any quality improvement activities, improving its services, billing, implementing appropriate security measures and training personnel;

- d) Where required, effectively communicate with third parties, including Medicare Australia, private health insurers and Department of Veteran's Affairs;

### **3. Disclosing your personal information**

#### **3.1 Disclosures**

Northern Beaches Neurology will confine its disclosure of your personal information to the primary purpose for which that information has been collected, or for a related secondary purpose. This includes when disclosure is necessary to facilitate the provision of health care services to you by a member of the Northern Beaches Neurology Team. To help us manage, conduct and oversee our business, or for security reasons.

We may provide your personal information to:

- a) Medical and other healthcare professionals involved in your care;
- b) government departments responsible for health, aged care and disability where Northern Beaches Neurology is required to do so;
- c) third parties contracted to provide services to Northern Beaches Neurology, such as entities contracted to assist in accreditation.
- d) Private health insurance providers and Medicare Australia
- e) Anyone authorised by you to receive your personal information (your consent may be express or implied);
- f) Anyone Northern Beaches Neurology is required by law to disclose your personal information to

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

Our practice will not use your personal information for marketing any of our goods or services directly to you without your express consent. If you do consent, you may opt out of direct marketing at any time by notifying our practice in writing.

## **4. Data storage, quality and security**

### **4.1. Data quality**

Northern Beaches Neurology will take reasonable steps to ensure that your personal information which is collected, used or disclosed is accurate, complete and up to date.

### **4.2. Storage**

All your personal information held by Northern Beaches Neurology is stored securely

### **4.3. Data security**

Northern Beaches Neurology strives to ensure the security, integrity and privacy of personal information, and will take reasonable steps to. Protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Northern Beaches Neurology reviews and updates (where necessary) its security measures in light of current technologies.

### **4.4. Data Breach**

In the event of a data breach, a response plan is in place to assess and contain breaches and to reduce the impact of a breach (data breach response framework available upon request). The plan includes notifying individuals affected and the Office of the Australian Information Commissioner if required.

### **4.5. Accessing and amending your personal information**

You have a right to access your personal information which Northern Beaches Neurology holds about you. If you make a request to access your personal information, we will ask you to verify your identify and specify the information your required.

You can also require an amendment to any of your personal information if you consider that it contains inaccurate information.

While Northern Beaches Neurology aims to meet all requests for access to personal information, in a small number of cases and where permitted to do so by law, Northern Beaches Neurology may not give access or may do so only under conditions.

Subject to applicable laws, Northern Beaches Neurology may destroy records containing personal information when the record is no longer required.

## **5. Dealing with us anonymously**

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

## **6. Complaints**

If you have a complaint about Northern Beaches Neurology information handling practices or consider we have breached your privacy, you can lodge a complaint with Northern Beaches Neurology by contacting the Practice at suite 4101, Level 1, Dee Why Grand Commercial Tower, 834 Pittwater Road, Dee Why, 2099, ph. (02) 9982 2270 or the Office of the Australian Information Commissioner, [www.oaic.gov.au](http://www.oaic.gov.au), ph. 1300363992.