

Privacy Policy

Approved by	Board of Healthia Limited
Approval date	May 2023
Next scheduled review	May 2025
Covered under policy	<p>Entities: Healthia Limited, My FootDr (Aust) Ltd, Allsports (Aust) Ltd, Extend Rehab Pty Ltd, iOrthotics Pty Ltd, Access Ortho Pty Ltd, D.B.S. Australia Pty Ltd, Natural Fit Footwear Pty Ltd, The Optical Company Pty Ltd, BIM Physiotherapy Group Holding Limited, Motion Health Group Holding Limited (NZ) and any other entity that is a subsidiary of Healthia Limited (collectively referred to throughout this policy as Healthia)</p> <p>Who: This policy applies to all Healthia staff and to people who work within Healthia including:</p> <ol style="list-style-type: none"> 1. Board of Directors of any Healthia entity and Board Sub-Committee Members 2. Executive, managers, clinic class shareholders and employees (whether full time, part time, casual, permanent or temporary), and 3. Volunteers, students, contractors and consultants
Related Policies	<ul style="list-style-type: none"> ▪ Code of Conduct and Behaviour Policy ▪ NDIS Code of Conduct
Related Documents	<ul style="list-style-type: none"> ▪ Ahpra and National Boards Code of Conduct June 2022 ▪ Australian Privacy Principles (APPs) in the Privacy Act 1988 ▪ Code of Ethics Speech Pathology Australia 2022 ▪ ESSA Professional Code of Conduct and Ethical Practice 2021 ▪ Good Medical Practice: A Code of Conduct for Doctors in Australia
Policy owner/s	Group CEO

Purpose

The purpose of this Privacy policy is to inform individuals how their personal information is collected, used, stored and protected by the Healthia Group.

Scope

Healthia's Privacy Policy applies to:

- All current and past patients, clients, customers, staff whose personal information we have collected.
- All individuals whose personal information is collected in relation to the products and services offered by the Healthia Group.
- All individuals whose personal information is collected by us in the course of our functions and activities, such as service providers, contractors etc.

This Privacy Policy applies to all sites and services.

Policy

1. Our commitment to privacy

Healthia Limited (ABN 85 626 087 223) and its subsidiaries take pride in delivering a personalised and friendly experience to each patient, customers and employee. In doing so, we respect a person's privacy and are committed to complying with the Australian Privacy Principles (APPs) in the Privacy Act 1988 as well as other State and Territory laws such as the *Health Records Act 2001 (VIC)*, *Health Records (Privacy and Access) Act 1997 (ACT)*, the *Health Records and Information Privacy Act 2002 (NSW)* and the *Health Information Privacy Code 1994* in New Zealand (**Privacy Laws**).

2. Content of our privacy policy

This Privacy Policy explains:

- 2.1 What kind of information we collect and hold about you
- 2.2 How and why we collect your information
- 2.3 What we do with that information and who we share it with (and when)
- 2.4 Keeping your information safe
- 2.5 Your rights

Please note that any reference made to “we”, “our” or “us” refers to each member of the Healthia Group.

2.1 What kind of information we collect and hold about you

Healthia Limited collects a range of personal information that may include the following:

- Name, date of birth, mailing and street address, email address, contact numbers
- Information about a patient or customer’s family or relatives or key contact people
- Health fund details
- Any government identifiers such as Medicare number, DVA number. However, we do not use these for the purposes of identifying you in our practice
- Other health and information such as a record of symptoms, relevant medical history, the diagnosis made and the treatment decisions made. Other information could include:
 - Specialist report
 - Test results
 - Prescriptions
 - A healthcare identifier
 - Other information for the purpose of providing care
 - Occupation and employer
 - Lifestyle and hobbies
 - Payment details
 - Details of products purchased, both online and in person, from our clinics
 - Any information that relates to a person that they provide to us directly through our website, email, written letters and phone conversations

2.2 How and why we collect your information

We will generally collect personal information through the following methods:

- Directly from a person when they give us your details (e.g., by completing a new patient/client form, face-to-face, over the phone or an online form, by entering a competition or leaving information on a message system)
- From a person responsible for you
- Purchase over-the-counter or online products
- Enquiry or complaint
- Incoming call list
- Third party when we are permitted by law to do that e.g.,
 - Third party government agencies (like the Department of Veteran Affairs and Medicare)
 - Private health insurers
 - Solicitors, lawyers and worker’s compensation companies
 - Medical professionals (such as general practitioners, allied health professionals, specialists etc).

We collect personal information that is necessary to provide the best possible health care to communicate and others involved in care in relation to those services and to maintain a high level of quality customer service.

Examples include:

- Administrative purpose in running our clinics
- Billing purposes
- Accreditation and quality assurance activities to improve individual and community health care and practice management
- Direct marketing purposes, mail and email reminders
- For the purposes of research and statistical analysis (only de-identified information is used unless otherwise specified)
- To comply with any legislative or regulatory requirements
- Sending communication to you about our products and services
- Advise you if a clinic will be closing down, merging or relocating

- Contact you in the event we have received a special order
- Update your records and keep your contact details current

By your use of our services and any of the Healthia Group websites, you consent to the collection, storage, use and disclosure of your personal information in accordance with this Privacy Policy and as otherwise permitted under the Privacy Act.

2.3 What we do with that information and who we share it with (and when)

Healthia Limited may use personal information for the following purposes;

- To comply with our legal obligations (e.g., mandatory reporting under legislation, responding to a court order or subpoena)
- To consult with other health professionals involved in a person's healthcare, including health care providers outside the Healthia Limited Group
- For use by a multidisciplinary treating team
- If a person has a My Health Record, to upload and to download personal information
- To get test results from diagnostic and pathology services
- To claim on insurance
- To communicate with a person's health fund, with government and other regulatory bodies such as Medicare
- To help us manage our accounts and administrative services (e.g., billing or debt recovery, arrangements with health funds, pursuing unpaid accounts etc)
- Provide a person with products and services, advise of upcoming promotions, specials and sales
- Respond to enquiries and online orders
- To improve our products and services
- Develop and improve our website
- Remind clients of upcoming appointments in the form of a phone call, SMS or email
- Advise clients and prospective clientele of meetings
- Inform a patient or client they have won a competition
- To transfer a patient/customer's records on the sale of a clinic at which they have been treated
- Respond to complaints and compliments made
- To lessen or prevent a serious threat to a patient/customer's life, health or safety or a serious threat to a public health or safety
- To help in locate a missing person
- To establish, exercise or defend an equitable claim through the My Health Record
- To prepare the defence of anticipated or existing legal proceedings
- To discharge notification obligations to liability insurers

We also outsource some of our services. This may involve us sharing personal information with third parties. For example, we outsource the conduct of our patient reminders to a third-party provider.

We do not sell, trade, or rent personal information to others. We may share generic aggregated demographic information, or de-identified health records not linked to any personal information, with our business partners, trusted affiliates and advertisers for the purposes outlined above, or to use for research purposes.

Direct marketing purposes, mail and email reminders

From time to time, we may collect and use your personal information so that we can promote and market our products and services to you and keep you informed of special offers from the Healthia Group. We may contact you in relation to these promotions and offers by direct mail, SMS and MMS messages, targeted marketing on social media platforms, by phone and email.

You can opt out of marketing by contacting us. However, if you opt out of marketing you will still receive service-related communications from us. If you have signed up to receive marketing from us via different email addresses, you may still receive marketing at any email addresses for which you have not opted out, as the above process will only identify where opted out email addresses are identical. Therefore, please tell us all email addresses you wish to opt out of receiving marketing in order to stop receiving marketing from us or on our behalf to those email addresses.

If you want to opt out of marketing, or change your preferences for communication from us, please let us know.

2.4 Keeping your information safe

We take appropriate security measures to keep your personal information protected, managed confidentially and securely, and destroyed appropriately when no longer required. We will monitor and implement appropriate technical advances or management processes to safeguard personal information.

A confidentiality agreement is entered into by all employees, contractors and agents at the time of their employment or engagement with us protecting the privacy of individuals. Where we outsource our services, we take reasonable steps in these circumstances to ensure that third parties have obligations under their contracts with Healthia to comply with all laws relating to the privacy (including security) and confidentiality of your personal information.

We view unauthorised disclosure of your personal information as a serious breach of misconduct by our employees, contractors and agents. If the disclosure of personal information is breached, disciplinary or legal action will be taken.

We endeavour to keep your information relevant, accurate, complete and up to date. When you arrive for an appointment, the receptionist at your clinic may request confirmation that your details have not changed. If you require your personal information to be updated, please contact your clinic. If you think that the information we hold about you is not correct, let us know in writing. We will take reasonable steps to correct your personal information where the information is not accurate or up-to-date.

We do not propose to disclose your personal information to recipients located overseas. If we want to transfer your personal information overseas, we will first seek your consent, unless we are required by law to do the transfer.

Cookies

When you visit a Healthia Group website, the server/s may attach a 'cookie' to your computer's memory. A 'cookie' assists us to store information on how visitors to the website use it and the pages that may be of most interest. This information may be used to provide users of your computer with information that we think may interest the users of your computer.

However, this information is not linked to any personal information you may provide and cannot be used to identify you. If you would prefer to disable this feature, it can be done in your web browser preference, however some features on our website may be dismantled by such action.

By providing any details through the website, you grant us full consent to have that information.

2.5 YOUR RIGHTS

2.5.1 Your right to seek access to and if required correction of the records we hold about you

You can request to have copies of your personal information, clinical notes, images and reports sent to them or a third party by contacting one of our centres to obtain a Release of Personal Information Consent Form. Your personal information will not be released unless a consent form has been signed, received and processed by the privacy.

- We will only disclose personal information in accordance with the Privacy Act. This means that personal information may be disclosed:
- For the purposes and uses for which we have advised that we are collecting it, and for related purposes that you would reasonably expect
- Where we have the consent by you to do so
- As required by law, or
- Under other circumstances where permitted under the Act.

2.5.2 Your right to receive treatment from us anonymously (or by using a pseudonym)

- Where it is lawful and practicable for us to do so, you can be treated anonymously or through use of a pseudonym (a name other than yours).

2.5.3 Your right to make a complaint

If you have concerns about how we have handled your privacy, let us know in writing and your complaint will be investigated, and you will receive a written response to your complaint within 30 days. If you are not satisfied with the response, you may lodge a privacy complaint with the Office of the Australian Information Commissioner.

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Post: GPO Box 5218 Sydney New South Wales 2001

Website: <https://www.oaic.gov.au/privacy/privacy-complaints/>

Relationship with Other Policies

Other policies that should be read in conjunction with this policy are:

- Code of Conduct and Behaviour Policy
- NDIS Code of Conduct

Related Documents

- Ahpra and National Boards Code of Conduct June 2022
- Australian Privacy Principles (APPs) in the Privacy Act 1988
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