

## **PRIVACY POLICY**

### **We are committed to protecting your privacy.**

As a health service provider we are bound by the *Privacy Act 1988* (Cth) (“**Act**”) and the thirteen Australian Privacy Principles (“**APPs**”). As a dental practice we also have professional and ethical obligations to protect your privacy and right to confidentiality.

This Privacy Policy sets out how we manage your personal information.

#### **1. What personal information do we collect?**

We collect personal information that is necessary to provide our services and carry on our dental practice.

The types of personal information that we collect from patients and prospective patients include:

- name and contact details;
- age, date of birth and gender;
- emergency contact details;
- dental history and previous dentists;
- medical history;
- details about your current health and medications;
- health insurance details; and
- billing and payment details.

Your health information is classed as ‘sensitive information’, which generally receives a higher level of protection under the APPs than other types of personal information.

#### **2. How do we collect your personal information?**

We collect personal information in several ways. We do so from you directly where possible (or from a legal guardian or representative if applicable),

Our dentists or other staff may also ask you to complete a patient questionnaire, provide additional information from time to time (sometimes, verbally; other times, in writing). We may also collect personal information about you from third parties if you have agreed that they can provide us with this information. For example, we may collect information from:

- your health insurance provider, if any;
- Government funding sources, if any (such as Medicare); and
- other dentists, dental specialists or other health practitioners (including your General Practitioner).

### **3. How do we use and disclose your personal information?**

Where we hold personal information that was collected for a particular (primary) purpose we will generally use or disclose it only for that purpose and not for any other (secondary) purpose *unless* you have consented, or we are otherwise permitted or required to do so (whether under the APPs, the Act, or another law).

#### ***Use of personal information***

The purposes for which we may use your personal information could include:

- to assess whether we can safely provide you with our dental services;
- to maintain and administer your patient file;
- to invoice you for our fees;
- to make payment claims to your health insurer (if any) and/or to any Government funding sources (such as Medicare);
- to contact you for follow up services and check-up reminders;
- to collect unpaid invoices; and
- to send information to you about our dental practice.

#### ***Disclosure of personal information***

The purposes for which we may disclose your personal information could include:

- making payment claims, and complying with audit and other legal obligations to the funder(s) (whether a health insurer, Government or both);
- seeking services or a second opinion from, or making a referral to, other dentists, dental specialists, laboratories or healthcare providers;
- debt collection, through a debt collection provider, if you do not pay our invoices;
- to respond in an emergency situation; and
- to comply with a written request from you.

We will also disclose your personal information if properly directed to do so by an appropriate government, regulatory or statutory body (including a court or tribunal).

### **4. How do we make sure that your personal information is accurate?**

We take reasonable steps to ensure that the personal information we hold about you is accurate, up-to-date and complete. These steps include:

- maintaining and updating your personal information when you attend the practice; and
- amending information when you let us know that any of your information has changed.

### **5. How do we protect and store your personal information?**

We provide ongoing training to our staff about the matters contained in this Privacy Policy. We take steps to protect the personal information we hold (whether in hard or electronic format)

against loss, misuse, unauthorised access, use, modification and/or disclosure. We ensure that hard copies of records are kept in locked files. We have security processes in place regarding computer access, and we take steps to ensure that electronic data is backed up.

When we no longer require your personal information we may securely destroy or de-identify your records in accordance with Australian laws.

## **6. Accessing your personal information**

You have the right to access the personal information that we hold about you. You can contact us in writing, by email or by telephone and request access to your personal information. Our contact details are set out in Section 8 of this Policy. We will always try to meet your request within a reasonable time.

In some circumstances, your request for access may be denied. These circumstances include:

- if we no longer hold any personal information about you;
- if your request is frivolous or vexatious;
- if the information requested relates to existing or anticipated legal proceedings and would not normally be disclosed as part of those proceedings;
- if providing access would be unlawful; and
- if denying access is required or allowed by law.

If we deny you access to the information you have requested, we will give you written reasons when we respond to your request.

We may charge you a reasonable fee for access to some types of information, limited to an amount to recoup our costs. Charges may include document retrieval, photocopying, X-ray and model costs, and delivery costs.

## **7. Correcting your personal information**

To enable us to provide you with the best service, it is important that the information we hold about you is accurate, up-to-date and complete. You will need to provide us with any changes to your personal information (including change of address, name, telephone number and other health providers) to enable us to update your records.

## **8. Overseas (cross border) disclosure**

It is not our standard practice to disclose or store personal information overseas. However, some of our service providers from time to time may be located overseas and/or they may store information outside of Australia. For example:

- data storage providers or web hosts may use servers, systems and cloud computing facilities outside of Australia;
- certain dental technologies or services may be provided by overseas companies and/or overseas laboratories.

If we become aware of such matters, we will:

- take reasonable steps to ensure that the overseas recipient does not breach the APPs;  
or

- seek to establish a reasonable belief that the overseas recipient is subject to protections which, overall, are at least substantially similar to those in the APPs (and which can be enforced).

We will also disclose personal information overseas if you give us informed consent in accordance with the APPs.

## **9. Further information and resolving your concerns**

You can contact us during our office hours if you have any questions, concerns or a complaint about this Privacy Policy or the way in which we manage your personal information. We will always try to respond to you and take any appropriate remedial action within a reasonable time. Any complaint should be in writing.

If we are unable to resolve a complaint with you directly, you may consider making an external complaint.

This Privacy Policy is available on our website at [www.WannerooDentalCentre.com.au](http://www.WannerooDentalCentre.com.au). You can also contact us and request that we send you a copy of this Policy by mail or email.

Our contact details are set out below:

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Practice Owner  
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