

## Privacy Policy

Integrated Specialist Healthcare (“**ISHC**”) recognises the importance of privacy and we are committed to protecting your personal information. Integrated Specialist Healthcare is required to comply with the Privacy Act 1988 (Cth) (“**Act**”) which provides for the fair handling of personal information, and sets standards for the collection, access, storage and use of personal information. Our policy for dealing with any personal information that you disclose to us is explained below. Our clinics are also governed by various State-specific privacy laws.

### About this Privacy Policy

This Privacy Policy outlines how we manage your personal information. It also describes generally the sorts of personal information held and for what purposes, and how that information is collected, held, used and disclosed.

This Privacy Policy applies to all your dealings with us whether using the Integrated Specialist Healthcare website ([www.ishc.org.au](http://www.ishc.org.au)), in writing or in person. By dealing with Integrated Specialist Healthcare, you consent to our use and disclosure of your personal information in the manner described in this Privacy Policy.

Integrated Specialist Healthcare’s Privacy Policy will be reviewed and updated from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current version of the Integrated Specialist Healthcare’s Privacy Policy. Please regularly check our Privacy Policy so that you are aware of these updates and changes.

### **What personal information does Integrated Specialist Healthcare collect?**

The type of personal information we collect depends on the nature of your dealings with us and the reason for collecting it.

Personal information means information or an opinion about you. The personal information we collect about you may include your name and contact details, your employment details and work experience, industry expertise, areas of interest, qualifications, aptitude test results, opinions about your work performance (eg references), incidents at the workplace, and other information obtained or received by us in connection with your possible and actual work placements, details of your dealings with us, and any other information reasonably necessary to provide you with our services.

Sensitive information is a special category of personal information under the Act. It is information or opinion about you, including membership of a professional or trade association or membership of a trade union, criminal record, health information, racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, or sexual preferences or practices. As outlined in the Act, sensitive information can, in most cases, only be disclosed with your consent.

For the purposes of this Privacy Policy, any reference to personal information can include sensitive information.

Integrated Specialist Healthcare may collect the following types of personal information:

- your name, address and telephone number;
- your age or date of birth;
- your Medicare number, Veterans' Affairs number, Health Care Card number, health fund details or pension number;
- current drugs or treatments used by you;
- information relevant to your medical care, including but not limited to your previous and current medical history and your family medical history (where clinically relevant);
- your ethnic background;
- your profession, occupation or job title;
- the name of any health service provider or medical specialist to whom you are referred, copies of any letters of referrals and copies of any reports back; and
- any additional information relating to you that you provide to us directly through our representatives, medical or allied health professionals providing services at or from our clinics or website, or otherwise.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

## **How do we collect personal information?**

How we collect personal information also depends on the nature of your dealings with us.

Integrated Specialist Healthcare collects personal information directly from you whenever it is reasonable and practical to do so.

When collecting personal information from you, we may collect it in ways including:

- by you completing one of our registration or patient information forms;
- by you booking an appointment either by contacting reception at one of our clinics or online through our website;
- as disclosed by you during the course of a consultation at our clinics or
- through your access and use of our website.

We may also collect personal information from third parties including:

- information provided on your behalf with your consent;
- from a health service provider who refers you to medical practitioners or allied health professionals providing services at or from our clinics;
- from health service providers to whom you are referred;
- from your employer or prospective employer;
- from your or your employers insurer; or
- from third party bodies such as law enforcement agencies and other government entities.

Where your personal information is provided to us by a third party, we will take reasonable steps to let you know that we have your personal information, unless it is obvious from the circumstances that you know or would expect us to have the information. Reasonable steps may include asking the person who gave us your information to let you know that we have that information.

If you are one of our suppliers or contractors, your personal information may be collected from you, your employer, employees or third parties.

If you elect not to provide some personal information to us, this may affect our ability to provide services to you.

## **Purposes and use for which we collect, hold, use and disclose your personal information**

Integrated Specialist Healthcare will only collect personal information in connection with providing services to you or carrying out business activities. Integrated Specialist Healthcare will only use your personal information for the purpose(s) you have provided the information, or as otherwise permitted by law.

Generally, the purpose for which Integrated Specialist Healthcare collects personal information will be apparent from the way in which we collect it, or will be disclosed at the time of collection. If at any time the purpose for which we are collecting your personal information is unclear, please raise your concerns with the person you are dealing with or contact us using the contact details below.

Personal information disclosed to Integrated Specialist Healthcare may be accessed by permitted users. In most circumstances, the personal information will be disclosed to people located in Australia.

When we engage the services of a third party, we take reasonable steps to ensure they comply with the Act and maintain the confidentiality of any personal information to which they have access.

If Integrated Specialist Healthcare is required to disclose personal information to an overseas recipient, Integrated Specialist Healthcare will take reasonable steps to ensure that the overseas recipient complies with the Australian Privacy Principles.

Integrated Specialist Healthcare does not disclose information about your individual visits to the Integrated Specialist Healthcare website.

Integrated Specialist Healthcare may use your personal information for research and development of our services or to send you information about other services offered by us which may be of interest to you. If you would prefer not to receive promotional or other material from us, please let us know by sending an email to the contact details below and we will respect your request. Alternatively, simply select the “unsubscribe” option in any of the emails that you receive from us.

Integrated Specialist Healthcare may disclose your personal information (including to trusted third parties) for the purposes for which it is primarily held or for a related secondary purpose and in some cases we may only disclose information with your consent.

## **The type of personal information we collect, hold, use and disclose**

If you are a patient, then your personal information may be collected, held, used and disclosed in connection with:

- providing medical services and treatment to you, enabling you to be attended by medical practitioners or other allied health professionals at our clinics;
- administrative and billing purposes;
- updating our records and keeping your contact details up to date;
- processing and responding to any complaint made by you;
- complying with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country;
- data research and analysis including conducting clinical trials and proactive screenings and for the purpose of sending you direct marketing communications in relation to these;

- inclusion in a recall register to be advised of follow up visits and medical updates;
- reporting back to your employer or prospective employer, their authorised representatives and their insurer in the case of a work-related consultation or service;
- answering enquiries and providing information or advice about existing and new products or services and all matters relevant to the services we provide to you;
- conducting business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of Integrated Specialist Healthcare, its contractors or service providers;
- to meet obligations of notification to our medical defence organisations or insurers; or
- research, development, business systems and infrastructure testing, and other business purposes to assist us in providing our services to you.

If you are applying for a role within Integrated Specialist Healthcare, then your personal information may be collected, held, used and disclosed in connection with:

- your actual or possible work placement;
- career guidance or management;
- your performance appraisals;
- our assessment of your ongoing performance and prospects;
- any test or assessment (including medical tests and assessments) that you might be required to undergo;
- our identification of your training needs;
- informing you of possible work opportunities or other events such as training or information sessions by direct mail/email/sms;
- any workplace rehabilitation;
- our management and resolution of any complaint, inquiry or investigation in which you are involved;
- any insurance claim or proposal that requires disclosure of your personal information; or
- undertaking criminal reference checks.

If you do not give us the information we seek, we may be limited in our ability to:

- locate suitable work for you; or
- place you in work.

### **General information collected from visitors to our website**

We gather information about all our website users collectively, such as what areas users visit more frequently and what services users access the most. We only use such data anonymously and in the aggregate. This information helps us determine what is most beneficial for our users, and how we can continually create a better overall website experience for you.

In some instances we may need specific information about you, such as name, address, email address, telephone number etc. We will collect this information if you apply for a job or sign up for a service via our website. We may also ask you for other information such as the types of jobs you are interested in and your workplace concerns in order to provide you with the best possible service and internet experience.

### **Anonymity and pseudonymity**

Given the nature of the services that we provide we generally are not able to deal with you on an anonymous or pseudonymous basis.

### **Where do we store the personal information collected?**

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium.

Integrated Specialist Healthcare stores its documents and personal information collected from those sources on:

- secure computer storage facilities;
- paper-based files and other records;
- servers located in India and Australia that are managed by either us or third party service providers such as Hostgator;
- a single cloud platform operated by Google and/or servers located in India by Hostgator that stores our emails and manages our email system.

We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

### **How do we ensure your personal information is correct?**

Integrated Specialist Healthcare takes all reasonable steps to ensure that your

personal information is accurate, complete and up to date. To assist, please contact us if any of the details you have provided are incorrect or have changed.

### **How do we keep your personal information secure?**

Integrated Specialist Healthcare is committed to keeping your personal information secure. We take reasonable steps to protect your personal information from misuse, loss and from unauthorised access, modification or disclosure.

While Integrated Specialist Healthcare uses all reasonable endeavours to ensure that you provide personal information in a secure environment, no data transmission over the internet can be guaranteed as totally secure. Integrated Specialist Healthcare does not accept responsibility of information transmitted to us over the internet.

Our website may contain links or plug-ins to other sites. We are not responsible for the content of the privacy practice or policies of, those sites.

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

You have the right to access your personal information held by Integrated Specialist Healthcare. You can also make a request for us to correct any inaccurate, incomplete or out-of-date personal information.

For security reasons, a written request may be required to access your information verifying your identity and specifying what information you require.

We may charge a small fee for the retrieval of your information. We are committed to granting your access to your personal information within a reasonable time frame if it is reasonable and practicable to do so. We will not refuse you access unless there are legal reasons for doing so. In such circumstances, we will explain those reasons to you.

### **Browsing the Integrated Specialist Healthcare website – does the website collect personal information?**

Integrated Specialist Healthcare does not collect personal information from casual visitors to our website, unless you have voluntarily supplied us with personal information via one of our web forms or via email.

When you visit the website and browse the information it contains, you do so anonymously unless you choose to provide us with information about yourself.

If you do nothing during your visit apart from browse through the website, for



example reading pages, viewing images, or downloading information without submitting any personal information, Integrated Specialist Healthcare will gather and store information about your visit automatically. This information does not identify you personally.

The information collected automatically may include the domain from which you access the internet, the date and time you access the website, and the internet address of the website from which you linked directly to the website. This information is used as an aggregate form to make the website more useful and attractive to its users.

Information gathered automatically is also for site management and, in the case of suspected unauthorised activity, law enforcement and possible criminal prosecution.

### **Cookies and how we use them**

A “cookie” is a small data file that can be placed on your hard drive when you visit certain websites. The website may use cookies to collect, store and sometimes track information for statistical purposes to improve services Integrated Specialist Healthcare provides. These cookies do not enable third parties to access any of your personally identifiable information.

The “help” portion of the toolbar on the majority of browsers will direct you on how to prevent your browser from accepting new cookies, how to command the browser to tell you when you receive a new cookie, or how to fully disable cookies. Integrated Specialist Healthcare strongly recommends that you leave the cookies activated, however, because cookies enable you to take advantage of some of Integrated Specialist Healthcare’s most attractive features on the website.

### **Do we use your personal information for marketing and business development purposes?**

We may use your information for research and development of our services or to send you information about other services offered by us which may be of interest to you. If you would prefer not to receive promotional or other material from us, please let us know by sending an email to us and we will respect your request.

### **Updates to this Privacy Policy**

This Privacy Policy will be reviewed and updated by Integrated Specialist Healthcare from time to time. Updated versions of this policy will be published on this website.

The updated Privacy Policy will apply whether or not specific notice of any change has been given.

## **Making a privacy complaint?**

Your privacy is important to Integrated Specialist Healthcare and we will make every effort to resolve your concerns. To assist us in helping you, we ask you to follow a simple three-step process.

1. Gather all supporting documents about the matter of complaint, think about the questions you want answered and decide on what you want us to do.
2. Telephone us on +61 2 9525 2340, and we will review your situation and if possible, resolve it straight away.
3. If you are not satisfied with our response, Integrated Specialist Healthcare may require you to submit your complaint in writing by email at [info@ishc.org.au](mailto:info@ishc.org.au) with your contact details. Integrated Specialist Healthcare will then investigate your complaint and endeavor to respond to you in writing within 30 days of receipt of your written complaint.

If at this stage the matter has not been resolved to your satisfaction, you can telephone the Australian Information Commissioner's hotline on 1300 363 992 or, if calling from outside Australia, +61 2 9284 9749.

## **Contact us about privacy**

Please direct your privacy related questions and feedback to Integrated Specialist Healthcare on +61 2 9525 2340 or [info@ishc.org.au](mailto:info@ishc.org.au).

## **Further information on privacy**

Further information may be obtained on privacy issues in Australia by visiting the Australian Information Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au).

Last updated: 1<sup>st</sup> July 2020