

1. Purpose

North Medical recognises the importance of your privacy. This Privacy Policy explains how North Medical manages the personal information that we collect, store, use and disclose and how to contact us if you have any further queries about our management of your personal information.

North Medical is required to ensure that all personal information pertaining to our customers, emergency contacts (including next-of-kin/guardians/carers of our customers), healthcare professionals, employees and contractors is treated in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the Health Records Act 2001 (Vic) (Health Records Act).

This Privacy Policy applies to you only to the extent that the collection and handling of personal information by North Medical is subject to the Privacy Act and Health Records Act.

2. RACGP Standards for General Practice relevant sections (if applicable)

- Core Standard 6 – Information management
- Core Standard 7 – Content of patient health records

3. Policy

3.1. Purpose and Application

This Privacy Policy explains how North Medical collects, holds, uses and discloses personal information, including health information, in accordance with the *Privacy Act 1988 (Cth)* and the *Health Records Act 2001 (Vic)*.

North Medical is committed to protecting your privacy and handling your personal information in a transparent, secure and lawful manner. This policy outlines your rights and our obligations in managing your information.

For the purposes of this Policy, “personal information” includes “sensitive information” (such as health information) unless otherwise stated.

What is Personal Information?

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable.

3.2. What is Health Information?

Health information is a type of sensitive information and includes information about your physical or mental health, medical history, and healthcare provided to you.

3.3. What Information We Collect

We collect only the information reasonably necessary to provide our healthcare services and carry out our business functions.

3.4. Types of Information

The information we may collect includes:

- Identifying and contact details (e.g. name, address, phone number, email)
- Information about your representatives (e.g. next of kin, guardian, medical power of attorney)
- Health information (e.g. medical history, medications, allergies, test results, prescriptions, treatment records)
- Medicare and other government identifiers (used only as permitted by law)
- Health fund and insurance details
- Billing and payment information
- Employment, education and qualification details (where relevant)

3.5. How We Collect Personal Information

We collect personal information by lawful and fair means and in a way that is not unreasonably intrusive.

3.6. Direct Collection

Where practicable, we collect information directly from you, including when you:

- attend appointments
- complete forms
- use our website or online booking systems
- communicate with us

3.7. Collection from Third Parties

We may also collect information from:

- Treating healthcare providers (e.g. GPs, specialists, hospitals, allied health professionals)
- Electronic health systems (e.g. My Health Record, SafeScript)
- Your authorised representatives
- Government and funding bodies (e.g. Medicare, WorkSafe, TAC, DVA, NDIS)
- Third-party service providers (e.g. booking or IT systems)
- Recruitment agencies and referees (for employment-related information)

We will only collect information from third parties where it is unreasonable or impracticable to collect it directly from you, or where permitted by law.

3.8. Purposes of Collection, Use and Disclosure

We collect, use and disclose your personal information primarily to:

- Provide healthcare services and manage your treatment
- Communicate with you (including appointment reminders and follow-ups)
- Manage billing, payments and claims
- Coordinate care with other healthcare providers
- Comply with legal and regulatory obligations
- Conduct quality assurance, accreditation and risk management activities
- Train staff and improve our services
- Manage complaints and incidents

We will only use or disclose your information for the primary purpose of collection or related secondary purposes that you would reasonably expect, unless we obtain your consent or are otherwise required or authorised by law.

3.9. Disclosure of Personal Information

We may disclose your information where necessary to:

- Your treating healthcare providers
- Electronic health systems (e.g. My Health Record)
- Your authorised representatives
- Government and funding bodies
- Third-party service providers assisting our operations
- Auditors and accreditation bodies
- Insurers and professional advisers
- Regulatory authorities

We may also disclose information where required or authorised by law, including in situations involving serious threats to health or safety, or to comply with court orders.

3.10. Data Quality and Security

We take reasonable steps to ensure that your personal information is:

- Accurate, complete and up to date
- Protected from misuse, interference and loss
- Secured against unauthorised access, modification or disclosure

Your information may be stored in electronic or paper form, including secure servers and cloud-based systems.

When no longer required, we will take reasonable steps to securely destroy or de-identify your information in accordance with legal requirements.

Only authorised staff and General Practitioners can view your health records based on their roles within the organisation. Access to the patient record system, inclusive of VPN access, immediately upon ceasing of employment at North Medical.

3.11. Overseas Disclosure

In some circumstances, we may disclose personal information to overseas service providers (e.g. IT or communication platforms).

Where this occurs, we will take reasonable steps to ensure those providers handle your information in accordance with Australian privacy laws.

3.12. *Direct Marketing*

We will only use your personal information for direct marketing where you have consented or where permitted by law.

You may opt out of receiving marketing communications at any time by:

- using the unsubscribe function; or
- contacting us directly

3.13. *Transferring Health Records Securely*

Patients have the right to request for their health records to be securely transferred to another medical practice. A formal transfer of records form must be 'wet ink' signed by the patient and provided to North Medical for any health information to be transferred.

An administration fee will be payable by the patient requesting their records to be sent to another medical practice.

Once requested and payment has been received, North Medical will compile and send, via a secure, third party file transfer system to the medical practice of the patients choosing. The file will be password protected and expire within 7 days of being sent.

3.14. *Access and Correction*

You have the right to request access to, and correction of, your personal information.

Requests can be made by contacting our Privacy Officer:

- Mail: Privacy Officer, North Medical, 702 Norman Street, Invermay Park VIC 3350
- Phone: (03) 4344 4044
- Email: info@northmed.com.au

We will respond within a reasonable time and may charge a reasonable administrative fee where permitted by law.

In some circumstances, we may refuse access or correction as permitted under the Privacy Act or Health Records Act. If so, we will provide reasons.

3.15. *Complaints*

If you believe your privacy has been breached, you may lodge a complaint with us in writing.

We will investigate and respond within a reasonable timeframe.

If you are not satisfied with our response, you may contact:

- Office of the Australian Information Commissioner (OAIC)
- Health Complaints Commissioner (Victoria)

Phone: 1300 582 113

Postal Address: Level 15, 50 Lonsdale Street, Melbourne, Vic, 3000

Online: <https://hcc.vic.gov.au/make-complaint>

3.16. *Changes to this Policy*

This Privacy Policy may be updated from time to time. The latest version will be available on our website.

4. Related documents

5. Policy monitoring

Review Frequency	<i>Yearly</i>
Policy History	<i>V1</i>
Date of next review	<i>04/2027</i>
Responsibility	<i>Practice Manager/Privacy Officer/Directors</i>