

Privacy policy for Acumedics Pty Ltd (t/as Peter Kington Acupuncture & Chinese Medicine)

Current as of: 1/1/2020

Introduction

This privacy policy is to provide information to you, our patient, on how your personal information (which includes your health information) is collected and used within our practice, and the circumstances in which we may share it with third parties.

Why and when your consent is necessary

When you register as a patient of our practice, you provide consent for our practitioners and practice staff to access and use your personal information so they can provide you with the best possible acupuncture and Chinese medicine. Only clinical staff who need to see your clinical personal information will have access to it. Administration staff will only have access to your personal information for what would be reasonable for them to complete the administrative side of your consultation. If we need to use your information for anything else, we will seek additional consent from you to do this.

Why do we collect, use, hold and share your personal information?

Our practice will need to collect your personal information to provide acupuncture and Chinese medicine healthcare services to you. Our main purpose for collecting, using, holding and sharing your personal information is to manage your health. We also use it for directly related business activities, such as processing private health insurance claims on your behalf and general accounting including processing payments. Other agencies may require this information, for example the ATO should they wish to complete a financial or tax audit on this business. From time-to-time this information may be accessed by practitioners or administration staff in the process of training or stream-lining the business.

What personal information do we collect?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- healthcare identifiers
- health fund details.

Dealing with us anonymously

You have the right to deal with us anonymously or under a pseudonym unless it is impractical for us to do so or unless we are required or authorised by law to only deal with identified individuals.

How do we collect your personal information?

Our practice may collect your personal information in several different ways.

1. When you make your first appointment our practice staff will collect your personal and demographic information via your registration. Your initial booking will require basic information which is entered into our practice management software (Cliniko) which is linked with our financial management software (Xero).
2. You will be asked to complete an incoming patient form and also a consent document. These documents are electronically scanned and stored against your file in Cliniko. The original documents

are shredded.

3. During the course of providing acupuncture and Chinese medicine healthcare services, we may collect further personal information.
4. We may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media.
5. In some circumstances personal information may also be collected from other sources. Often this is because it is not practical or reasonable to collect it from you directly. This may include information from:
 - your guardian, partner or other responsible person
 - other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services

When, why and with whom do we share your personal information?

We sometimes share your personal information:

- with third parties who work with our practice for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with APPs and this policy
- with other healthcare providers
- when it is required or authorised by law (eg court subpoenas)
- when it is necessary to lessen or prevent a serious threat to a patient's life, health or safety or public health or safety, or it is impractical to obtain the patient's consent
- to assist in locating a missing person
- to establish, exercise or defend an equitable claim
- for the purpose of confidential dispute resolution process
- when there is a statutory requirement to share certain personal information (eg some diseases require mandatory notification)

Only people who need to access your information will be able to do so. Other than in the course of providing medical services or as otherwise described in this policy, our practice will not share personal information with any third party without your consent.

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.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms.

- Initial paperwork is stored, until electronically scanned and attached to your file, at the clinic or off-site storage. This information is then securely shredded in a timely manner.
- Electronically
- Historical paper files are stored securely, offsite. Annually these are reviewed and shredded as per the requirements for health records.

Our practice stores all personal information securely.

Electronic storage

Our financial software is Xero.

- Xero securely stores your data on servers located in the United States of America.

- Xero Australia's privacy note can be found here: <https://www.xero.com/au/about/legal/privacy/>

Our practice management software is Cliniko, provided by Red Guava Pty Ltd.

- Red Guava Pty Ltd/Cliniko stores its data on servers located in the United States of America and Australia.
- As per the Red Guava privacy policy: "use of data collected in Cliniko by a business or practitioner that is Personal Information relating to third parties is limited to providing support and technical assistance to our Customers". Red Guava Pty Ltd's privacy policy can be found here: <https://www.cliniko.com/policies/privacy/>

Archived/historical information, potentially relating to you, may be stored in iCloud or Dropbox.

- Dropbox securely stores its information primarily in the United States, but also Australia, Germany and Japan for some Dropbox Business users.
- iCloud (Apple Inc) stores metadata (the data that describes the files) on its own servers and breaks up the rest of the data into chunks and stores that Amazon S3 and Google Cloud (or similar, unspecified servers).

How can you access and correct your personal information at our practice?

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

Our practice acknowledges patients may request access to their medical records. We require you to put this request in writing via email or hard copy and our practice will respond within 30 days, unless advised otherwise.

An administration fee of \$110 (inc. GST) is due prior to the request being processed. This fee is not for your information, rather the time taken to collate. If this process should be extensive and take longer than 1 hour, additional 30 minute blocs will be charged at \$55/30min intervals. This will be advised in advance.

Our practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. From time to time, we will ask you to verify that your personal information held by our practice is correct and current. You may also request that we correct or update your information, and you should make such requests in writing to info@peterkington.com.au

How can you lodge a privacy-related complaint, and how will the complaint be handled at our practice?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing. We will then attempt to resolve it in accordance with our resolution procedure.

All privacy-related complaints will be replied to within 30 days, unless advised otherwise.

Complaints may be emailed to: info@peterkington.com.au or via hard copy:

Mr Peter Kington
117 Earl Street
Greenslopes QLD 4120

Please include all supporting and relevant documentation.

You may also contact the OAIC. Generally, the OAIC will require you to give them time to respond before they will investigate. For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992.

Privacy and our website

If you contact us via the website www.peterkington.com.au you will have provided basic contact information including your name, telephone number and email address.

Other, optional, information relating to your enquiry may also be provided.

No webform enquiry information is stored in any database.

Emails are stored on practice computers and portable devices. Emails pass through the website email server.

The website is hosted by Hostaway in Western Australia. Hostaway's servers are located in Australia.

Cookies are not enabled on www.peterkington.com.au however Google analytics is enabled.

If you engage with this practice via its professional Facebook page or via Twitter or Instagram then those organisations will track your movements.

Policy review statement

This privacy policy is reviewed annually or as required when change is required. When changes are made to this policy a sign will be placed on the clinic reception.

Copies of the policy can be emailed, free of charge and on request, at any time. The privacy policy is available for viewing on the website.