

Privacy Policy



Introduction

Western Ultrasound for Women adheres to the Australian Privacy Principles (APPs) outlined in the Privacy Amendment Act 2012 (the Act) and seeks to manage personal information in an open and transparent way.

Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect, or otherwise handle your personal information online.

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur, and thus may be updated at any time. You may return to our Privacy page available at <http://www.westernultrasound.com.au/privacy> for updates, notifications, to provide feedback, or to understand how we comply with Australian Privacy Principles.

This Privacy Policy explains;

- the kinds of personal information Western Ultrasound for Women requires,
- how Western Ultrasound for Women collects and stores personal information,
- the users' right to anonymity and pseudonymity,
- the purpose for which Western Ultrasound for Women holds, collects, uses, and discloses personal information
- how an individual may access personal information about the individual that is held by Western Ultrasound for Women and see the correction of such information,
- how an individual may complain about a breach of the Australian Privacy Principles that binds Western Ultrasound for Women and how we will respond to that complaint
- whether Western Ultrasound for Women is likely to disclose information to overseas recipients; and if Western Ultrasound for Women is likely to disclose personal information to overseas recipients – the countries in which such recipients are likely to be located if it is practicable to specify this information.
- statements on the Notifiable Data Breaches Scheme, Google advertising, and Use of 'cookies' on our website

Why and When Your Consent is Necessary

When you register as a patient of our practice, you provide consent for our doctors and practice staff to access and use your personal information. This is so we can provide you with the best possible healthcare service. Only staff who need to see your personal information will have access to it. If we need to use your information for anything else, we will seek additional consent from you to do this.

Personal Information held by Western Ultrasound for Women

Western Ultrasound for Women (WA) Pty Ltd ABN: 85 109 671 776

enquiries@westernultrasound.com.au | westernultrasound.com.au |
1/160a Cambridge St, West Leederville WA 6007 |
SJOG Wexford Medical Centre, 3 Barry Marshall Parade Murdoch WA 6150 |
(08) 9388 1340 | (08) 9388 1340 |

Patients and Prospective Patients

Information we commonly collect may include but is not limited to:

- name, gender, and date-of-birth
- addresses, and contact details
- medical information which may include but is not limited to history, medications, allergies, adverse reactions, and immunisations
- Medicare, pension, health fund details, and other government identifiers
- family, social and employment history and circumstances, health services requested or provided, and the outcome or results
- billing information
- expressed wishes about the provision of health services
- details of feedback, complaints, and suggestions

Referring Medical Practitioners, Practice Managers and Ancillary Staff

Information we commonly collect about referring medical practitioners, practice managers and ancillary staff, may include but is not limited to:

- name, address, telephone numbers, fax/email address, and other contact details
- Medicare provider numbers and billing information
- area of specialisation
- service delivery preferences, referral patterns and fees paid by referred patients
- expressed wishes about the provision of health services.
- service improvement comments/preferences
- details of feedback, complaints, and suggestions

Staff

Information we commonly collect about Staff includes but is not limited to:

- name, address, telephone numbers, email address and other contact details
- banking details, Tax File Number, and Super Choice information
- employment records
- performance records

Employment Applicants

Information we commonly collect about employment applicants includes but is not limited to:

- name, address, email address and other contact details
- letters of application/expressions of interest and associated correspondence
- Curriculum Vitae/Resume
- referee comments



Anonymity and Pseudonymity

Individuals are entitled to approach Western Ultrasound for Women anonymously to discuss or to dispute our compliance with Australian Privacy Principles. Patients may approach us anonymously and request service; however the service itself may not be able to be provided as personal information is relevant to extend the healthcare required.

It is impracticable for patients to receive healthcare from Western Ultrasound for Women anonymously or by using a pseudonym. This is because:

- diagnosis and advice will be significantly impaired
- there would be an unacceptable risk to patient safety
- there may be mismatching of that individual's results
- the disconnect between Western Ultrasound for Women and that patient's referring medical practitioner is unacceptable for patient care
- it may result in a breakdown of good health care practices including the inability to extend longitudinal studies where appropriate
- examination may not be claimed under Medicare or Private Health Funds

How Western Ultrasound for Women Collects Personal Information

Western Ultrasound for Women collects personal information:

1. When you make your first appointment, our practice staff will collect your personal and demographic information via your registration, and referral information if any provided by your referring medical practitioner.
2. During the course of providing medical services, we may collect further information through your MyHealth Record.
3. We may collect your personal information when you visit our website, send us an email or SMS, telephone us, fax us, or communicate with us using any other online means.
4. 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 directly from you. This may include information from:
 - a. Your parent or guardian or other responsible person
 - b. Other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services, and pathology and diagnostic imaging services.
 - c. Your health fund, Medicare, or the Department of Veteran's Affairs (as necessary).

Solicited v Unsolicited Information

Most of the personal information collected by Western Ultrasound for Women is solicited. On occasion Western Ultrasound for Women may receive unsolicited information. When unsolicited information is received but we determine we could have collected the information, the principles outlined in this policy will still apply. If we determine we could not collect this information, and it is not contained in Commonwealth record, then we will de-identify, or destroy the information as soon as practicable, and if it is lawful and reasonable to do so.



How Western Ultrasound for Women Holds Personal Information

Western Ultrasound for Women commonly holds personal information in the following ways:

- electronic soft copies
- hard copies
- digital audio recordings
- digital and hard copy images (X-rays, ultrasound scans, CT scans, videos, and photos)
- paper based and other hard copy documents located securely within the practice. (All practices have twenty four hour security systems);
- Contained in electronic records in a secure environment; and
- Archived in dedicated secure storage facilities

Security of Personal Information

We have procedures in place to store personal information securely to protect from misuse and loss, unauthorised access, modification, or disclosure.

Processes include but are not limited to:

- hard copy documents are located securely within the practice or secure storage centres. All practices have twenty four hour security systems
- data in electronic databases are housed in a secure environment, protected by hardware and software firewalls, scanned regularly using antivirus and malware applications.
- records are only accessible by persons who require access to that information for the purpose of carrying out their employment.
- hard copy documents securely destroyed using a dedicated third party document destruction service
- our website, associated online web forms, data, and content management system are protected by an SSL certificate at the secured version of our site located at <https://wufw.worldseuresystems.com>
- real time tracking of data security breaches from cyberattacks is in place
- staff training is provided in handling personal and sensitive information

How Western Ultrasound for Women Uses Personal Information

Western Ultrasound for Women may collect personal information;

- for the primary purpose for which it was collected; or
- for related secondary purposes which we believe are within reasonable expectations for purposes of your primary care; or
- in a manner for which you have given consent or have implied consent



Western Ultrasound for Women may collect Sensitive Information as defined in the Privacy Act as reasonably necessary for, or directly related to, one or more of our functions or activities as a health care provider.

Patients

Primary Purposes

- to provide services relating to one or more of our healthcare functions or activities
- to link medical records of patients to their healthcare provider(s)
- ensure relevant testing and imaging
- diagnose and interpret results
- allow billing and payments

Secondary Purposes

- a permitted health situation arises
- to provide the basis for longitudinal studies
- for internal administrative requirements
- budgetting, service management, planning, evaluation and accreditation activities;
- for inquiries or complaints regarding compliancy with Australian Privacy Principles;
- defence of anticipated or existing legal proceedings;
- notification to the individual of the collection of personal information
- to our insurers, lawyers, and other experts for the purposes of addressing liability indemnity arrangements or to obtain counsel on our professional obligations;
- for teaching purposes, case studies, and multidisciplinary clinical team meetings in de-identified form;
- for provision of further information to the individual about additional diagnostic or treatment options;

Your personal information may be used or disclosed for one or more of the purposes outlined above with the assumption your implied consent was provided during the course of our provision of health care services to you..

Uses Requiring Patient Consent

Western Ultrasound for Women will obtain your express consent if your health information is proposed to be used or disclosed without de-identification for:

- direct marketing or other forms of advertising,
- external medical research

If research is being contemplated, reasonable steps will be taken to ensure you understand what the proposed research involves, the ways in which your health information will be used, and the risks and benefits of agreeing to participate.

Referring Clinicians, Practice Managers, and Ancillary Staff



Primary Purposes

- to provide a range of quality healthcare service for patients
- to link medical records to patients and their healthcare provider
- ensure relevant testing
- to diagnose and interpret results
- to tailor services to a referrer's needs

Secondary Purposes

- electronic communication via email or mail
- to provide educational material to referrers and their staff

Disclosure of Personal Information

Western Ultrasound for Women may disclose your personal information:

- for acquiring a second medical opinion
- to other health providers or a service providing direct clinical care to a patient
- to a third party health provider within a hospital campus or medical facility where an individual is undergoing imaging or receiving medical treatment
- when it is necessary to lessen or prevent a serious threat to a patient's life, health or safety, or public health and safety, and/or it is impractical to obtain the patient's consent
- to establish, exercise, or defend an equitable claim
- to a third party who works in conjunction with our practice for business purposes, such as accreditation agencies or information technology providers; where such third parties are also required to comply with APPs and this policy
- for the purpose of confidential dispute resolution
- during the course of providing medical services, through MyHealth Record
- when there is a statutory requirement to share certain personal information (eg some diseases require mandatory notification)
- where it is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body
- when it is required by law

Only people that 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 consent.

Our practice will not use your personal information for marketing any of our 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.

An Individual's Right to Control the Use and Disclosure of Personal Information.



Western Ultrasound for Women believes that the use and disclosure of personal information in the ways described in this policy will reflect the reasonable expectations of an individual dealing with us.

However, sometimes an individual may want their health information to be used or disclosed in a particular way.

Western Ultrasound for Women respects such wishes and will, in accordance with the Act and the APPs, take all reasonable steps to comply with such wishes.

Integrity of Personal Information

Western Ultrasound for Women takes reasonable steps to ensure personal information it holds is:

- accurate, and relevant to the primary purpose of patient's care
- up to date
- complete

For Patients

- personal information is reconfirmed at the start of each treatment or imaging session where reasonable and practicable to do so

For referring practitioners, their staff and other third parties

- providing mechanisms on our Privacy page to update personal information.
- updating records via face-to-face feedback, phone or written contact accordingly.

Access to and Correction of Personal Information

Access

Individuals have the right to access personal information and associate a statement with that personal information held by Western Ultrasound for Women. An individual does not have to provide a reason for requesting access, however, proof of identity will be required before your written request is considered.

No charge will be levied on the making of requests, for correcting personal information, or for associating a statement with personal information; though administrative charges may apply to all others.

The preferred method for patients to access results is in consultation with their treating practitioner where the results can be explained in the context of their health management. To submit a written request, please mail your request to the address included at the end of this document. All requests will be processed within 30 days.

Western Ultrasound for Women may refuse to allow access to personal information and will provide a written response that sets out:

- the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
- the mechanisms available to complain about the refusal; and
- any other matter prescribed by the regulations.



Western Ultrasound for Women is not required to provide access to your personal information if:

- Western Ultrasound for Women reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- giving access would have an unreasonable impact on the privacy of other individuals; or
- the request for access is frivolous or vexatious; or
- the information relates to existing or anticipated legal proceedings between Western Ultrasound for Women and the individual, and would not be accessible by the process of discovery in those proceedings; or
- giving access would reveal the intentions of Western Ultrasound for Women in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- giving access would be unlawful; or
- denying access is required or authorised by or under an Australian law or a court/tribunal order; or
- Western Ultrasound for Women has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to Western Ultrasound for Women's functions or activities has been, is being or may be engaged in; and giving access would likely prejudice the taking of appropriate action in relation to the matter; or giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- giving access would reveal evaluative information generated within Western Ultrasound for Women in connection with a commercially sensitive decision-making process.

Correction

If an individual believes their personal information is inaccurate, out of date, incomplete, irrelevant, or misleading, then the individual may apply for the information to be corrected by contacting Western Ultrasound for Women.

Western Ultrasound for Women may refuse to correct personal information and will provide a written response that sets out:

- the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
- the mechanisms available to complain about the refusal; and
- any other matter prescribed by the regulations.

Request to Associate a Statement or Opinion

- if Western Ultrasound for Women refuses to correct the personal information as requested by the individual; and
- the individual requests Western Ultrasound for Women to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading;

Western Ultrasound for Women will take such steps as are reasonable in the circumstances to associate a statement in such a way that will make the statement apparent to users of the information.

Direct Marketing



Western Ultrasound for Women does not use personal information for direct marketing.

An individual may advise us that they do not wish receive direct marketing from us at any time by contacting the privacy officer.

We will not sell, trade, disclose, or otherwise transfer your personal information to a third party for any marketing purposes.

A Statement on Notifiable Data Breaches Scheme

The Notifiable Data Breaches (NDB) scheme under Part IIIC of the Privacy Act 1988 (Privacy Act) establishes requirements for data breach notification obligations when a data breach occurs.

In order to be in line with Notifiable Data Breaches scheme we will take the following responsive action, should a data breach occur, and where it is reasonable and practicable to do so:

- we will notify you via email within 7 business days
- we will notify the users via in-site notification at this page within 7 business days

A Statement on Google Advertising on our Website

Google's requirements for advertising on the Google Network can be summed up by Google's Advertising Policies. They are put in place to provide a positive experience for users across websites participating in the Google Network. You may find more information at <https://support.google.com/adwordspolicy/answer/1316548?hl=en>. Advertising on the Google Network often results in advertising material tailored to your online activities, and broadcasted directly through all web pages participating in the Google Network.

- Western Ultrasound for Women has not enabled Google AdSense on our site.

A Statement on the Use of 'Cookies' on our Website

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) enabling the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, cookies help the website understand your preferences based on previous or current site activity, enabling the website to provide you with improved usability. Often, cookies help compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

- Western Ultrasound for Women uses cookies to compile aggregate data about site traffic and site interactions in order to offer better site experiences. We may also use trusted third-party services that track this information on our behalf.
- you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn how to manage or modify your settings.



- If you disallow the use of cookies, some of the features that make your site experience more efficient may not function properly. However, this shouldn't significantly affect the user's experience.

Privacy Complaints Process

We take complaints and concerns regarding privacy seriously. If an individual feels that Western Ultrasound for Women has not adhered to or breached APPs, you may variously during any contact point with our organisation inquire about, provide comment, or submit feedback about our processes. You may also make a complaint in writing, directly to our organisation. Complaints may be lodged to Western Ultrasound for Women's Privacy Officer using the below contact information.

Where reasonable, Western Ultrasound for Women will respond to complaints within 30 days.

If the individual has not received a response within 30 days or is dissatisfied with the response from Western Ultrasound for Women they may lodge a complaint with the Office of the Australian Information Commissioner.

Contact Information

Any questions about Western Ultrasound for Women's Privacy Policy or complaints can be raised with Western Ultrasound for Women's Privacy Officer.

Western Ultrasound for Women Privacy Officer

1/160a Cambridge Street
West Leederville, WA 6007

P: (08) 9388 1340

F: (08) 9388 1351

E: business@westernultrasound.com.au

W: <http://www.westernultrasound.com.au>

Office of the Australian Information Commissioner (OAIC)

GPO Box 5218
Sydney, NSW 2001

P: 1300 363 992

E: enquiries@oaic.gov.au

W: <http://www.oaic.gov.au/>

OAIC Online Privacy Complaint Form

https://forms.business.gov.au/smartforms/landing.htm?formCode=APC_PC



