**The Special Needs Dental Team** is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your health and personal information. A Notice to Patients is posted in our patient waiting area as a summary statement of the policy.

We are bound by the Australian Privacy Principles (APP) contained in the Commonwealth *Privacy Act 1988* (**Privacy Act**) and *the Health Records Act Victoria 2001.* A copy of the APP may be obtained from the website of the Office of the Australian Information Commissioner at [www.aoic.gov.au](http://www.aoic.gov.au).

When you accept our products or services, contact us, or visit the Special Needs Dental Team website at specialneedsdental.com.au you agree to the handling of your personal information according to this policy.

## **Types of information we collect**

The types of information we may collect includes (but is not limited to)

* You name and contact details including postal address, email address, phone numbers;
* Personal details such as age or gender;
* Medicare number and private health insurance details;
* Financial information (e.g. credit card numbers or bank account details for payment of services); and
* Sensitive information including health information, medical history, dental assessment and treatment plans.

## **Collection and use of information**

We collect health information directly from you and your authorised representatives to provide you with dental treatment. We may collect the personal information you directly give us through some of the following means:

* When you contact us via telephone, facsimile or email;
* In administering and performing any contracts with service providers;
* From correspondence with you (whether in writing or electronically);
* While conducting customer satisfaction and market research surveys;
* When administering any of our services including telehealth; and
* As otherwise required to manage our business.

We will only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act.

Personal information such as your name, address, health insurance and financial details are used for the purpose of addressing accounts to you, as well as for processing payments, collecting unpaid invoices via an external collection agency, and writing to you about our services and any issues affecting your health care.

We may also collect health information from publicly available sources and third parties such as your treating dental clinician, our business partners, your health insurance provider or Medicare.

We will only collect your e-mail address if you send us a message or you provide us with your address directly. It will only be used for the purpose for which you provided it. You have the option of having your email address deleted from our records at any time.

## **Non-disclosure of information**

You have the right to either refuse to provide details about yourself or remain anonymous. If you choose not to provide us with information relevant to your care, we may not be able to provide a service to you, or the service we are asked to provide may not be appropriate for your needs. Importantly, you could suffer some harm or other adverse outcome if you do not provide information relevant to your care.

## **Disclosure**

The purpose of collecting your information is to provide you with a dental service; for internal and external administrative purposes, insurance purposes and record keeping.

We will not use your health information for any other purpose unless one of the following applies:

1. You have consented;

2. You would reasonably expect that your information may be used for that purpose;

or

3. The use of your health information is required or authorised by law.

Examples of circumstances where we may disclose to third parties include:

* To healthcare professionals where required to provide you dental services
* To organisations that provide us with technical and support services;
* To your nominated emergency contact;
* To government and regulatory bodies including Medicare;
* To third party health benefit providers and insurance companies (sensitive health information will not be provided);
* To our professional advisors.

## **Data quality**

The practice takes steps to ensure that the health information we collect is accurate, up to date and complete. These steps include maintaining and updating personal and health information when you attend the practice or you advise us that your personal information has changed. If you find that the information we have is not up to date or is inaccurate, please advise use as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

## **Data security**

The practice keeps hard-copy and electronic records. We protect them by ensuring hard-copy records are kept in locked files and there are security processes in place regarding computer access. Electronic data is backed-up using cloud storage on local servers in Australia.

No method of transmission over the internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal and health information, we cannot guarantee its absolute security. We have deployed the following security measures to support more secure communication of sensitive information across the Internet.

* All communication between the servers used by the practice and workstations owned by the practice is over an encrypted Virtual Private Netword (VPN).
* All workstations in the practice are protected by firewalls and antivirus software which are regularly updated.
* Access to workstations, email accounts and electronic health records is password protected
* We use a videoconferencing platform with Transport Layer Security (TLS) for telehealth

## **Website security and cookies**

When you visit our practice website specialneedsdental.com.au a record of your visit is logged by our internet service provider. This may include information such as: your server address, your domain or top level domain name, the date, time and duration of your visit to the site, the pages you accessed and documents downloaded, the previous site you visited, and the type of browser you are using. Your ISP may collect more or less information for you.

Non-personally identifiable information may be collected in aggregated and anonymised forms to monitor usage patterns on our site in order to improve its features. We do not use this information for advertising.

Our website may contain links to third-party websites. We are not responsible for other websites’ privacy practices, and care should be taken when providing personal information on any website.

The Special Needs Dental Team website is hosted in Australia. If you use the website from outside Australia, you are voluntarily transferring content (potentially including personally identifiable information) to Australia and agreeing that Special Needs Dental Team’s collection, use, storage and sharing of that content is subject to the laws of Australia rather than the laws of the country in which you are located.

## **Marketing**

Our practice may use your information for the purpose of direct marketing; however, we will not on-sell your personal information.

We understand that you may not wish to receive marketing materials. If you would prefer not to receive such information, please contact our reception on 9877 8035 or [admin@drkerrie.com.au](mailto:admin@drkerrie.com.au).

## **Sending information overseas**

It is not our standard practice to disclose or store personal information overseas. However, some of our service providers may be located overseas and/or they may store information outside of Australia. For example: certain dental technologies or services, dental laboratories, transcription service providers, professional indemnity insurers, or other third-party service entities. These providers may be located offshore.

We will try to inform you about where your information is sent. Please be assured that we take reasonable steps to ensure compliance with the Australian Privacy Principles in relation to any off-shore transfer of your information.

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

## **Access and correction**

You can request access to your health or personal information we hold, or request that we change that information.

Requests for access or correction must be in writing and directed to the practice manager.

You can access or make changes to your health or personal information unless we consider that there is a sound reason under the Privacy Act, or other relevant law to withhold the information, or not make the changes. We are not obliged to correct any of your personal information if we do not agree that it requires correction and we may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

The Special Needs Dental Team will not change any fee for your access request, but may charge an administrative fee for providing a copy of our personal information. In order to protect your personal information we may require identification from you before releasing the requested information.

After a period of 7 years (and if you attended the practice as a child, you have reached the age of 25) we may destroy your records in accordance with applicable laws.

## **Complaints**

We take complaints very seriously. Please advise us if you suspect there has been or may have been a breach of your privacy. (See Enquiries below).

You can lodge a complaint in a number of ways: by phone, email, in writing or in person.

Your complaint will be reviewed in-house. Any appropriate corrective action required to manage this breach and any preventive actions required in order to prevent breach in future will be discussed and decided. You will be sent a letter explaining the review process and the consequences of the review.

In the event of a privacy breach, we will comply with applicable guidelines issued by the Office of the Australian Information Commissioner.

For more information about Privacy laws, or to raise concerns about any matter not satisfactorily resolved with the practice you can contact

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| **Office of the Australian Information Commissioner**  GPO Box 5218  Sydney NSW 2991  Telephone: 1300 363 992  Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  www.oaic.gov.au | **Health Complains Commissioner**  Level 26, 570 Bourke Street  Melbourne VIC 3000  1300 582 113 (9am-5pm Mon-Fri)  [www.hcc.vic.gov.au](http://www.hcc.vic.gov.au) |

## **Enquiries**

For further information about the practice’s management of privacy, please contact us at:

**Special Needs Dental Team**

43 Blackburn Rd, PO Box 89

Blackburn VIC 3130

Email: [admin@drkerrie.com.au](mailto:admin@drkerrie.com.au)

Tel: (03) 9877 8035

Fax: (03) 9878 1831

## **Updates to this privacy policy**

The Special Needs Dental Team may update this privacy policy in line with the need to accurately reflect its data collection and disclosure practices. An up-to-date copy of our Privacy Policy is available on our website. We encourage you to review this policy from time to time so you will know if it has been changed or updated.

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| **DOCUMENT DETAILS** FOR OFFICE USE ONLY (NOT FOR PATIENT)  This policy should be reviewed annually and any changes to policy and actions required should be documented and signed. | |
| **Responsible person** | Dr Kerrie Punshon |
| **Review cycle** | When website is updated, or other security measures put in place |
| **Date of last review** | 24/09/2020 |