

PRIVACY POLICY

June 2025



1. Introduction:

1.1 Health On Collins Pty Ltd As Trustee For Health On Collins Unit Trust, trading as Healthcare on Collins (“Practice”), provides facilities and services to support health practitioners and independent medical practitioners who deliver medical and healthcare services to their patients. Our support services to the practitioners includes employing staff and utilising computer software to collect and use patient information.

2. Purpose:

2.1 This Privacy Policy is to provide information to you on how your personal information (which includes your sensitive information, including your health information) is collected and used within our Practice, and the circumstances in which we may share it with third parties.

3. Why and how your consent is necessary:

3.1 When you register as a patient of a practitioner who consults from our Practice, you provide consent for us (including our employees, agents, contractors and other representatives) to access and use your personal information so the health practitioners and independent medical practitioners consulting from our Practice can provide you with the best possible healthcare. Only persons who need to see your personal information will have access to it. If we need to use your information for any other purposes, we will seek additional consent from you to do so.

4. Why do we collect, use, hold and share your personal information:

4.1 Our practice will need to collect your personal information to facilitate the provision of healthcare services to you by the health practitioners and the independent medical practitioners consulting from our practice. Our main purpose for collecting, using, holding and sharing your personal information is to facilitate the management of your health by those health practitioners and the independent medical practitioners. We also use it for directly related business activities, such as financial claims and payments, practice audits and accreditation, and business processes (e.g. staff training).

5. What personal information do we collect:

5.1 The information we will collect about you includes your:

- (a) names, date of birth, addresses, contact details including emergency contact and next of kin;
- (b) demographic information, including gender, cultural background, and religious beliefs;
- (c) medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors;
- (d) Medicare number (where available) for identification and claiming purposes;
- (e) healthcare identifiers;
- (f) concession card details;
- (g) health fund details; and
- (h) occupation.

PRIVACY POLICY

June 2025



6. Dealing with us anonymously:

- 6.1 You have the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorised by law to only deal with identified individuals.
- 6.2 Please be aware that Medicare rebates are only available where a Medicare card (and / or associated information) is available. As such your practitioner may require you to pay for your consults in full without this rebate if you choose to deal with us anonymously or under a pseudonym.

7. How do we collect your personal information:

7.1 Our Practice may collect your personal information in several different ways:

- (a) You may provide us with your personal information directly (for example, when you make an appointment with a practitioner consulting from our Practice or use the check-in 'kiosk' when you arrive, our Practice staff will collect your personal and demographic information via your registration).
- (b) The health practitioners and independent medical practitioners providing healthcare and medical services may also collect further personal information from you which may be disclosed to us. Information can also be collected through My Health Record, e.g. via Shared Health Summary, Event Summary or through a Discharge Summary provided by a hospital or other healthcare service providers.
- (c) We may also collect your personal information when you contact us via our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media.
- (d) We may contact you via SMS on your practitioner's behalf for appointment reminders, health reminders and brief clinical messages. The details of these messages will only be revealed upon entering required information. You may be removed from the SMS reminder and communication system upon request.
- (e) We avoid sending emails on behalf of your practitioner as emailing of personal information is not a secure method of communication. Should you however request information to be emailed to you, your practitioner will explain the risks associated with transmitting personal information in this way and will obtain your verbal consent. On your practitioner's behalf, we will password protect all documents, notify you of the password verbally and email your personal information to a verified email address.
- (f) 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:
 - i your guardian or responsible person;
 - ii other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services; and / or
 - iii your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).
 - iv your employer in connection with workers' compensation claims, pre-employment medical checks or other lawful reasons in connection with your employment.

7.2 If your practitioner deems it in your best interest to discuss your clinical information with you, we will arrange for this to occur either in person, via telephone or via videoconference.

7.3 When you arrive for your appointment with your practitioner, we will require you to identify yourself to ensure we have arranged the appropriate appointment to facilitate the delivery of healthcare services to you

PRIVACY POLICY

June 2025



by your practitioner. We must ask you for three approved forms of identification (e.g. name, address and date of birth). We understand that providing these details within the vicinity of other patients may be a privacy concern. If you have any concerns, you may either check in using our kiosk check in service or provide us with photo identification when you arrive.

8. When, why and with whom do we USE AND share your personal information:

8.1 We collect, use and disclose your personal information to facilitate the provision of health care and medical services to patients of the health practitioners and independent medical practitioners consulting from our practice.

8.2 We may also share your personal information:

- (a) with other healthcare providers;
- (b) when it is required or authorised by law (e.g. court subpoenas, or where we are obliged to make a mandatory notification to a regulatory body);
- (c) 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 where it is otherwise impractical to obtain your consent;
- (d) to assist in locating a missing person;
- (e) to establish, exercise or defend a claim;
- (f) for the purposes of confidential dispute resolution processes;
- (g) during the course of providing nursing support services;
- (h) for the purposes of uploading that information to your My Health Record, such as through the shared health summary or event summary; and / or
- (i) 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 the Australian Privacy Principles (“**APPs**”) and this policy.

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

8.4 We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

8.5 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.

8.6 We may provide de-identified data to other organisations for education and research purposes, or to improve population health outcomes. You can let our reception staff know if you do not want your de-identified data included.

8.7 Your practitioner may use artificial intelligence, to record and summarise your consultation and store the transcript of the appointment in your medical record. These notes will be reviewed by your practitioner to ensure they accurately reflect your appointment before they are relied upon to provide medical advice.

PRIVACY POLICY

June 2025



8.8 We cannot, and do not, determine or instruct the independent medical practitioners about how they deliver their medical services to you, including which artificial intelligence program they utilise for their patient consults. Our Practice therefore cannot make any warranties or guarantees on how the specific artificial intelligence program will collect, store or use data. Please direct any queries or concerns you have in relation to the artificial intelligence program directly to your practitioner. They will also be able to provide you with access to the relevant terms and conditions and privacy policy for the specific artificial intelligence program they use. We will not be liable under any circumstances for any damages of any kind recognised by law due to the artificial intelligence program and liability is limited to the extent of our negligence or misconduct. We will participate in updating you on your practitioner's behalf if need be of any communications received from your practitioner in relation to the artificial intelligence program. Any complaints should be sent directly to the owner of the artificial intelligence program.

9. How do we store and protect your information:

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

9.2 Our Practice stores information as electronic records (including via cloud-based services), visual records (including x-rays, CT scans and photos) and archived paper records.

9.3 Our Practice stores all personal information securely via the use of passwords, encrypted back-ups, confidentiality agreements for staff and secure cabinets.

9.4 All records will be retained until the later of seven (7) years from your last contact with the practice, or until you reach the age of twenty-five (25).

9.5 We take steps to destroy or de-identify information that we no longer require.

9.6 Our server security policy is designed to protect the servers from unauthorised access, data breaches, and other security threats. Our Practice uses the following security measures to ensure the personal information which it holds is secured:

(a) Antivirus software is installed on all servers and updated regularly.

(b) Firewalls are configured to block unauthorised traffic.

(c) Servers are placed on their own subnet.

(d) Access to servers is restricted to authorised users.

(e) Cloud managed network switches and UPS systems with no physical servers on-site, and the switches and UPS batteries are located in a locked room.

(f) Servers are patched regularly to fix security vulnerabilities.

(g) Backups are created regularly every day onsite with daily offsite backups.

9.7 Healthcare on Collins has an extensive business continuity plan to enable the ongoing facilitation of healthcare services to you by the health practitioners and independent medical practitioners consulting from our Practice in the event of any unforeseen events such as computer hardware failure. This business continuity plan includes the electronic back up and replication of your personal information. Back up data is stored offsite in a secure cloud. Replicated data is hosted securely in data centres located in Australia and can only be accessed by our information technology providers, your practitioner and authorised members of our team.

10. How can you access and correct your personal information at our practice:

PRIVACY POLICY

June 2025



- 10.1 You have the right to request access to, and correction of, your personal information.
- 10.2 Our Practice acknowledges patients may request access to their medical records. You can lodge this request either via our website's contact page (<https://healthcareoncollins.com.au/contact/>) or telephone. Our Practice will acknowledge your request within three (3) business days. We can post the requested information to your postal address, or we can email the information to you if you request it. If we are required to process a request for your records, we may charge for our reasonable costs incurred in complying with your request.
- 10.3 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 through our website's contact page at the following address: <https://healthcareoncollins.com.au/contact/>. There is no fee charged for making corrections to your personal information.

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

- 11.1 We take complaints and concerns regarding privacy seriously. You should express any privacy concerns (including any breach of the APPs or any registered binding APP code) you may have in writing.
- 11.2 Complaints should be submitted via post or electronically via the website's contact page (<https://healthcareoncollins.com.au/contact/>) and be addressed to:
 - (a) Name and Position: Marie Moolenaar, Business & Practice Manager
- 11.3 Address: Level 4, 250 Collins Street, Melbourne VIC 3000. We will respond with acknowledgement of your complaint within three (3) business days and provide a response within thirty (30) business days.
- 11.4 You may also contact the Office of the Australian Information Commissioner (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.
- 11.5 You may also contact the Office of the Victorian Information Commissioner (OVIC). For further information, visit ovic.vic.gov.au or call the OVIC on 1300 006 842.

12. Privacy and our website:

- 12.1 If you "like" or comment on our social media pages, we will have your social media name.
- 12.2 Our website does not use cookies.
- 12.3 Our website may contain links to third-party websites. We are not responsible for the content or privacy practices of websites that are linked from our website.

13. Privacy statement review"

- 13.1 This privacy policy will be reviewed annually to ensure it is in accordance with any changes that may occur.
- 13.2 Last reviewed: 11 June 2025.