

YOUR OPTIMAL HEALTH CENTRE

PRIVACY POLICY

VERSION 1.0 as at 1 November 2022

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1. ABOUT THIS POLICY

1.1 Purpose

Your Optimal Health Centre is committed to ensuring the privacy and confidentiality of your personal information.

Your Optimal Health Centre must comply with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) and other privacy laws that govern how private sector health service providers like Your Optimal Health Centre handle your personal information (including but not limited to patient health information).

The purpose of this Privacy Policy is to clearly communicate to you how Your Optimal Health Centre handles your personal information. It will give you a better and more complete understanding of the type of personal information that Your Optimal Health Centre holds about you and the way Your Optimal Health Centre handles that information.

This Privacy Policy applies to the Australian companies and facilities in the Australian Centre for Integrative Medicine Group which are listed at the end of this Privacy Policy.

1.2 Multi-layered approach

This Privacy Policy has been developed in accordance with a 'layered policy' format endorsed by the Office of the Australian Information Commissioner. This means that it offers you the ability to obtain more or less detail about Your Optimal Health Centre's information handling practices – depending on how much you wish to read, what you need to know and how quickly you need to obtain the relevant information.

If you only require basic information about Your Optimal Health Centre's information handling practices, you can view our 'condensed' privacy policy at item 16. This is a summary of how Your Optimal Health Centre collects, uses and discloses your personal information and how you can contact Your Optimal Health Centre if you would like to access or correct any personal information which Your Optimal Health Centre holds about you.

If you require more detailed information about Your Optimal Health Centre's information handling practices, then you will need to read this document.

1.3 Who does this Policy apply to?

This Privacy Policy applies to Your Optimal Health Centre's collection, use and disclosure of personal information from patients and visitors, next-of-kin, nominated support persons, referring doctors, Accredited Health Professionals, contracted health professionals, trainees and students undertaking training placements in our facilities, contractors, suppliers, and service providers engaged by us, medical representatives attending our facilities, employees and other individuals engaged by or providing services to Your Optimal Health Centre (collectively 'Other Individuals').

In relation to employees of Your Optimal Health Centre, this Privacy Policy will apply only to the extent that the collection, use or disclosure of that personal information does not fall within the definition of an exempt practice pursuant to section 7B(3) of the Privacy Act 1988 (Cth).

1.4 Currency

This Privacy Policy was last updated in November 2022 and may change from time to time. The most up-to-date copy will be published on the Your Optimal Health Centre website or can be obtained by contacting us on the details set out at the end of this policy.

2. HOW YOUR OPTIMAL HEALTH CENTRE HANDLES YOUR PERSONAL INFORMATION

2.1 Your Optimal Health Centre's Legal Obligations

As foreshadowed in Part 1 of this Privacy Policy, as a private sector health service provider, Your Optimal Health Centre is required to comply with the APPs under the Privacy Act 1988 (Cth).

The APPs regulate how Your Optimal Health Centre may collect, use, disclose and store personal information and how individuals may access and correct personal information which Your Optimal Health Centre holds about them. For ease of reference, this Privacy Policy sets out Your Optimal Health Centre's position with respect to patient and other individuals' personal information separately, although the APPs will apply equally.

2.2 Terms used

In this Privacy Policy, we use the terms:

"Personal information" as it is defined in the Privacy Act 1988 (Cth) means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

Personal information also includes **'sensitive information'** which is information such as your race, religion, political opinions or sexual preferences, biometric information used for biometric verification or identification, and biometric templates, and health information. Information which is 'sensitive information' attracts a higher privacy standard under the Privacy Act 1988 (Cth) and is subject to additional mechanisms for your protection.

"Health information" as it is defined in the Privacy Act 1988 (Cth) is a particular subset of 'personal information' and means information or an opinion about:

- the health or a disability (at any time) of an individual; or
- an individual's expressed wishes about the future provision of health services to him or her; or
- a health service provided or to be provided to an individual, that is also personal information.

"Primary purpose" means the specific function or activity for which the information is collected. Any use or disclosure of the personal information for another purpose is known as the **"secondary purpose"**.

"Your Optimal Health Centre facility/ies" means patient services operated by Your Optimal Health Centre.

2.3 Who does Your Optimal Health Centre collect information from?

2.3.1 Patients

In order to provide you with the health care services that you have requested (including assessment for or information in relation to the provision of health care services), Your Optimal Health Centre will need to collect and use your personal information. If you provide incomplete or inaccurate information to us or withhold personal health information from us we may not be able to provide you with the services you are seeking.

2.3.2 Other individuals

In order to enable Your Optimal Health Centre to engage with you for the relevant primary purpose, Your Optimal Health Centre may need to collect and use your personal information. If you provide incomplete or inaccurate information to us or withhold personal information from us we may not be able to engage with you as required to meet that primary purpose.

2.3.3 Anonymity and pseudonymity

You have the option of dealing with Your Optimal Health Centre anonymously or by using a pseudonym; however, we note that this may limit the services that we can provide to you if it is impracticable for us to deal with you in such an unidentified manner.

2.4 What information does Your Optimal Health Centre collect?

2.4.1 Patients

We collect personal information from you that is reasonably necessary to provide you with health care services and for administrative and internal business purposes related to your attendance at a Your Optimal Health Centre facility.

Often this may include collecting information about your health history, family history, your ethnic background or your current lifestyle to assist the health care team in diagnosing and treating your condition.

We will usually collect your health information directly from you. Sometimes, we may need to collect information about you from a third party (such as a relative or another health service provider). We will only do this if you have consented for us to collect your information in this way or where it is not reasonable or practical for us to collect this information directly from you, such as where your health may be at risk and we need your personal information to provide you with emergency medical treatment.

With your consent, your health care team may discuss your case at a multi-disciplinary team meeting. Your Optimal Health Centre may collect information from your health care team which has been disclosed for the purpose of the multi-disciplinary team meeting and manage it in accordance with this Privacy Policy.

In some circumstances, personal information may be collected in the form of clinical images for the purpose of assisting with your treatment or recording developments in your treatment. Your Optimal Health Centre will, in such cases, manage your personal information contained in these clinical images in accordance with the APPs and this Privacy Policy.

In some circumstances, Your Optimal Health Centre may collect information from an electronic Government record repository such as the Australian Immunisation Register or MyHealth Record (collectively 'Government Record'). Your Optimal Health Centre may access personal information stored in your Government Record in accordance with the access controls that you have set within each system (as applicable). If you do not want Your Optimal Health Centre to access personal information stored in your Government Record, it is your responsibility to modify the access controls as required. Your Optimal Health Centre will only access information stored in the Government Record to the extent required for your treatment by Your Optimal Health Centre.

2.4.2 Other individuals

We collect personal information from you that is reasonably necessary to engage with you for the primary purpose, including the provision of services by Your Optimal Health Centre, for Your Optimal

Health Centre's functions or activities and for administrative and internal business purposes related to your dealings with Your Optimal Health Centre.

In relation to individuals employed or engaged by Your Optimal Health Centre, individuals providing services to Your Optimal Health Centre or Students, this may include sensitive information including criminal record or working with children checks, health information and biometric data.

We will usually collect your personal information directly from you. Sometimes we may need to collect information about you from a third party; however, we will only do this where it is not reasonable or practical for us to collect this information directly from you. Sensitive information will not be collected without your consent unless authorised by law.

2.5 How does Your Optimal Health Centre store your information?

Your Optimal Health Centre may store the personal information we collect from you in various forms. Your Optimal Health Centre will comply with the APPs, and this Privacy Policy, in respect of your personal information in whatever form that information is stored by us.

2.5.1 Patients

Storage of personal information may be in physical (paper) form and may also include through an electronic medical record system or storage of personal information (including clinical images taken for diagnostic or treatment purposes) on some diagnostic equipment where you have undergone a diagnostic procedure using such equipment in a Your Optimal Health Centre facility. As some Your Optimal Health Centre facilities utilise shared resources, your patient medical records may be stored offsite with a third party provider.

2.5.2 Other individuals

Personal information may be stored in various forms including electronically via various data management software or systems in accordance with usual business practices, and depending on the primary purpose of your engagement with Your Optimal Health Centre.

2.6 How does Your Optimal Health Centre use your information?

Your Optimal Health Centre only uses your personal information for the primary purpose for which you have given the information to us, unless one of the following applies:

- The secondary purpose is related (or for sensitive information, directly related) to the primary purpose for which you have given us the information and you would reasonably expect, or we have told you, that your information is usually disclosed for another purpose or to other individuals, organisations or agencies (see related secondary purposes set out below);
- you have consented for us to use your information for another purpose;
- Your Optimal Health Centre is required or authorised by law to disclose your information for another purpose (see related secondary purposes set out below);
- the disclosure of your information by Your Optimal Health Centre will prevent or lessen a serious and/or imminent threat to somebody's life, health or safety or to public health or public safety; or
- the disclosure of your information by Your Optimal Health Centre is reasonably necessary for the enforcement of a criminal law or a law imposing a penalty or sanction, or for the protection of public revenue.
- Your Optimal Health Centre may use or disclose your personal information as specified above via electronic processes, where available or relevant.

Related secondary purposes include:

The following is a list of examples of related secondary purposes for which Your Optimal Health Centre may use your personal information, but is not an exhaustive list.

Patient specific examples:

[\(a\) Use among health professionals to provide your treatment](#)

Modern health care practices mean that your treatment will be provided by a team of health professionals working together.

You may be referred for diagnostic tests such as pathology or radiology and our staff may consult with senior medical experts when determining your diagnosis or treatment. With developments in technology (e.g. telemedicine) our staff may consult with health professionals and medical experts located remotely, including outside Your Optimal Health Centre, in relation to your diagnosis or treatment, including by sending health information and clinical images. Our staff may also refer you to other health service providers for further treatment (for example, to a physiotherapist or outpatient or community health services). We may disclose your personal information to the relevant provider to the extent required for any such referral (including disclosing that information electronically).

Your personal information will only be disclosed to those health care workers involved in, or consulted in relation to, your treatment and associated administration and to the extent required to meet that purpose (including participation in multi-disciplinary team meetings). In some cases this information may be made available electronically including by way of secure portal or application.

These health professionals will share your personal information as part of the process of providing your treatment. We will only do this while maintaining confidentiality of all this information and protecting your privacy in accordance with the law.

If you require prosthesis or another medical implantable product as part of your treatment, we may in some cases disclose your personal information to the manufacturer or supplier of that product to ensure appropriate supply of that product and to enable appropriate follow up.

[\(b\) Assessment for provision of health care services](#)

If you are referred to a Your Optimal Health Centre by your doctor, and you have previously attended Your Optimal Health Centre, we may, subject to the period of time that has passed between appointments, use the personal information (such as your address and contact details) we hold from your previous appointment to streamline the referral process in our digital patient system.

Your Optimal Health Centre may collect your personal information for the purpose of assessing your suitability for health care services at a Your Optimal Health Centre. Where personal information is collected and you do not become a patient of Your Optimal Health Centre, your personal information may be stored for a limited period of time before destruction. Where your assessment has been conducted at the request of a Health Practitioner, Your Optimal Health Centre may report the outcome of the assessment to that Health Practitioner as it may be relevant to any ongoing treatment or care provided to you by them.

Where you undergo assessment by a third party provider (for example ACAT or a rehabilitation provider), Your Optimal Health Centre may disclose your personal information to the third party provider for treatment purposes.

(c) Your local doctor

Your Optimal Health Centre will usually send a summary to your referring medical practitioner or nominated general practitioner following treatment at our centre. This is in accordance with long-standing health industry practice and is intended to inform your doctor of information that may be relevant to any ongoing care or treatment provided by them. This summary may be sent to your referring medical practitioner or general practitioner electronically.

If you do not want us to provide a copy of your summary to your nominated general practitioner you must let us know. Alternatively, if your nominated general practitioner has changed or your general practitioner's details have changed following a previous treatment, you must let us know.

(d) Other health service providers

If in the future you are being treated by a medical practitioner or health care facility that needs to have access to the health record of your treatment at a Your Optimal Health Centre, we will generally require an authorisation from you to provide a copy of your record to that medical practitioner or health care facility.

However, we may provide information about your health records to another medical practitioner or health facility outside Your Optimal Health Centre without your consent in the event of an emergency where your life or health is at risk and you are not able to provide consent or as approved or authorised by law.

(e) Students and trainees

Your Optimal Health Centre supports the placement of students and trainees at Your Optimal Health Centre and these students and trainees may have access to your personal information for the purpose of the placement. Students and trainees on placement at Your Optimal Health Centre are required to comply with the Privacy Act 1988 (Cth) (or other relevant privacy legislation) and where applicable our Privacy Policy.

(f) Relatives, guardian, close friends or legal representative

We may provide information about your condition to your spouse or partner, parent, child, carer, other relatives, close personal friends, guardians, or a person exercising your power of attorney under an enduring power of attorney or who you have appointed your enduring guardian, unless you tell us that you do not wish us to disclose your personal information to any such person.

(g) Other Your Optimal Health Centre entities

Your Optimal Health Centre may share your personal information amongst its entities listed at the end of this Privacy Policy. For example, this may occur where you are transferred between any of Australian Centre for Integrative Medicine and Your Optimal Health Centre or to coordinate your care.

(h) Your Optimal Health Centre Pharmacy service providers

In order to provide pharmacy services to you, we will disclose your personal information to the relevant pharmacy provider. Your personal information will only be disclosed to the extent required for your treatment and on the condition that the Your Optimal Health Centre undertakes to comply with the Privacy Act 1988 (Cth) (or other relevant privacy legislation) and where applicable our Privacy Policy.

Your personal information will only be provided to a retail pharmacy provider to provide services where you have requested that service and/or consented to that disclosure.

(i) MyHealth Record

For patients who participate in the MyHealth Record program (operated by the Commonwealth Department of Health), Your Optimal Health Centre may upload personal information electronically to the MyHealth Record system unless you opt out.

(j) Invitation to participate in clinical trials

At times Your Optimal Health Centre may become aware of clinical trials which may be relevant to your medical condition. Your Optimal Health Centre may use your personal information to assess your suitability for participation in the clinical trial in order to provide you with initial information about the clinical trial. Other than as authorised by law, Your Optimal Health Centre will not disclose your personal information to the clinical trial researcher without your consent.

(k) Combined Consultations and treatment

At times we will allow combined consultations with naturopaths and allied health professionals or other medical personnel to facilitate combined care and the integrative medical approach. Combined consultations will be provided with consent.

(l) Multi-disciplinary team meetings

Multi-disciplinary team meetings provide a forum for clinicians from different disciplines to provide individualized and integrated treatment planning (eg pathologist, physiotherapist, naturopath, hospital and rehabilitation). Following a multi-disciplinary team meeting, a summary of your case may be made available to the health practitioners involved in, or consulted in relation to, your care. This is in accordance with long-standing health industry practice and is intended to inform your doctor or health practitioners of information that may be relevant to any ongoing care or treatment provided by them. This summary may be sent to your doctor or health practitioners electronically.

(m) Your Optimal Health Centre Clinic

Your Optimal Health Centre operates a Clinic providing outpatient allied health services. Where you have been referred to a Your Optimal Health Centre Clinic by a medical practitioner, we will usually send a summary of the care provided to you back to that referring medical practitioner. This is in accordance with long-standing health industry practice and is intended to inform your Doctor of information that may be relevant to any ongoing care or treatment provided by them. This treatment summary may be sent to your referring medical practitioner electronically.

Where your outpatient allied health services are funded or coordinated by a third party in relation to an injury claim (eg WorkCover, TPD, MVA or similar), we may provide reasonable information to the third party (eg treatment plan, goals, attendance records, summary of care provided, recommendations etc) for the purpose of the third party administering your claim. This information may be sent to the third party electronically.

(n) Other common uses

In order to provide the best possible environment in which to treat you, we may also use your personal information where necessary for:

- activities such as quality assurance processes, in accordance with government accreditation or, audits, risk and claims management, patient satisfaction surveys and staff education and training;
- invoicing, billing and account management, including storage of provider details on Your Optimal Health Centre billing software or engagement of third party providers to assist with debt collection;

- to liaise with your health fund, Medicare, the Department of Veteran's Affairs or another payer and, where required, provide information to your health fund, Medicare, the Department of Veteran's Affairs or other payer to verify treatment provided to you, as applicable and as necessary;
- the purpose of complying with any applicable laws – for example, in response to a subpoena or compulsory reporting to State or Federal authorities (for example, for specified law enforcement or public health and safety circumstances or upload to the Australian Immunisation Register where you have received a vaccination by Your Optimal Health Centre or at a Your Optimal Health Centre Facility);
- the purpose of sending you standard reminders, for example for appointments and follow-up care, by text message or email to the number or address which you have provided to us; and
- communicating important information to you regarding your health fund cover and any financial or management implications in respect of your care at a Your Optimal Health Centre Facility;
- we may anonymise or aggregate the personal information that we collect for the purpose of carrying out customer, service, health outcome and other business analytics.

[\(o\) Other uses with your consent](#)

With your consent we may also use your information for other purposes such as including you on a marketing mail list, research, statistical analysis, to promote Your Optimal Health Centre goods and services and to improve and personalise our service offerings. Please note, however, that unless you provide us with your express consent for this purpose, we will not use your information in this way.

Other non-patient specific examples:

[\(p\) Accessing Your Optimal Health Centre facilities and associated services provided at Your Optimal Health Centre facilities](#)

Your Optimal Health Centre may collect personal information (including details such as your name, email address and telephone number) to facilitate your access to Your Optimal Health Centre facilities (for example for Covid-19 screening purposes) and to provide associated services at Your Optimal Health Centre facilities (for example WIFI, Virtual Waiting Room), use of which is subject to any terms provided at the time of accessing the facility or relevant service. You may decline to provide personal information for this purpose but access to the facility or service may not be granted in that case.

[\(q\) Camera surveillance systems](#)

Your Optimal Health Centre does use camera surveillance systems, at its facility for the purpose of maintaining the safety and security of its staff, patients, property, visitors and other attendees to those facilities. Your Optimal Health Centre's camera surveillance systems may, but will not always, collect and store personal information. Your Optimal Health Centre will comply with the APPs and this Privacy Policy in respect of any personal information collected via its camera surveillance systems.

[\(r\) Contractors under agreement](#)

Your Optimal Health Centre may provide, or allow access to, personal information to contractors engaged to provide professional services to Your Optimal Health Centre's business (e.g. Information Communication Technology providers) or to contractors to whom aspects of our services are outsourced. Where we outsource any of our services or hire contractors to perform professional services within our hospitals or health services (for example visiting medical officers, agency staff or

allied health services) we require them to also comply with the Privacy Act 1988 (Cth) (or other relevant privacy legislation) and where applicable our Privacy Policy.

(s) Application for accreditation by health professionals

Your Optimal Health Centre collects personal information from health professionals seeking accreditation and submitting to the credentialing process under its Facility Rules. Personal information provided by health professionals in this context is collected, used, stored and disclosed by Your Optimal Health Centre for the purposes of fulfilling its obligations in connection with the Facility Rules.

(t) Job applications

Your Optimal Health Centre collects personal information of job applicants who have responded to an advertised position for the primary purpose of assessing and (if successful) engaging applicants. The purpose for which Your Optimal Health Centre uses personal information of job applicants includes:

- employment or engagement suitability checks;
- managing the individual's employment, engagement or placement;
- insurance purposes; and
- ensuring that it holds relevant contact information.

Your Optimal Health Centre may also store information provided by job applicants who were unsuccessful for the purposes of future recruitment or employment opportunities.

(u) Students / Trainees

Your Optimal Health Centre collects personal information of students or trainees on placement for the primary purposes of providing the placement and facilitating assessment. The purposes for which Your Optimal Health Centre uses personal information of students or trainees include:

- managing the individual's placement;
- ensuring the quality and safety of clinical care provided to Your Optimal Health Centre patients;
- insurance purposes;
- ensuring that it holds relevant contact information; and
- satisfying its legal obligations including obligations under any placement agreement.

Your Optimal Health Centre may also store information provided by students or trainees following placement for the purpose of future recruitment or employment opportunities. If you do not want us to store your information in such circumstances, please let us know.

(v) Education and community engagement

Your Optimal Health Centre may offer opportunities for health practitioners to participate in educational events or seminars for the purpose of continuing professional development or community engagement. When you register for or attend an event, Your Optimal Health Centre may collect your personal information for the purpose of providing the service and recording your attendance.

Your Optimal Health Centre may disclose your personal information to third parties for the purpose of confirming your attendance at the event including the provision of attendance records or certification. With your express consent, we may use your information for other purposes such as

including you on a marketing mail list, fundraising or research, to promote Your Optimal Health Centre goods and services and to improve and personalise our service offerings.

(w) Clinical research

Your Optimal Health Centre collects personal information contained within research applications relating to clinical research to be conducted at a Your Optimal Health Centre or involving data held by Your Optimal Health Centre. Personal information provided in this context is collected, used, stored and disclosed by Your Optimal Health Centre for the purpose of managing the research application.

(x) Other common uses

We may also use your personal information where necessary for:

- activities such as quality assurance processes, in accordance with government accreditation or, audits, statistical analysis, risk and claims management;
- invoicing, billing and account management, including storage of provider details on Your Optimal Health Centre billing software;
- the purpose of complying with any applicable laws – for example, in response to a subpoena or compulsory reporting to State or Federal authorities (for example, for specified law enforcement or public health and safety circumstances or upload to the Australian Immunisation Register where you have received a vaccination by Your Optimal Health Centre or at a Your Optimal Health Centre Facility); and
- We may anonymise or aggregate the personal information that we collect for the purpose of carrying out customer, service and other business analytics.

(y) Other uses with your consent

With your consent we can also use your information for other purposes such as including you on a marketing mail list, fundraising or research, statistical analysis, to promote Your Optimal Health Centre goods and services and to improve and personalise our service offerings. Unless you provide us with your express consent for this purpose, we will not use your personal information in this way.

(z) Online portals and forums

Your Optimal Health Centre may offer opportunities for you to register to use online portals or forums operated by Your Optimal Health Centre. When you register for an online portal or forum, Your Optimal Health Centre will collect your personal information for the purpose of providing you with access to the service, including tailoring the platform to display information relevant to you. Using a portal or forum is subject to your acceptance of any terms or conditions provided at the time of registering for the relevant service.

We will only do this while maintaining confidentiality of all this information and protecting your privacy in accordance with the law.

2.7 Access to and correction of your personal information

You have a right to have access to the personal information that we hold about you (for patients, this includes health information contained in your health record). You can also request an amendment to personal information that we hold about you should you believe that it contains inaccurate information.

Your Optimal Health Centre will allow access or make the requested changes unless there is a reason under the Privacy Act 1988 (Cth) or other relevant law to refuse such access or refuse to make the requested changes.

If we do not agree to change your personal information in accordance with your request, we will permit you to make a statement of the requested changes and we will enclose this with your personal information.

Should you wish to obtain access to or request changes to your personal information held by Your Optimal Health Centre you can ask for our Privacy Officer (see details below) who can give you more detailed information about Your Optimal Health Centre's access and correction procedure.

Your Optimal Health Centre may recover reasonable costs associated with supplying this information to you.

2.8 Data quality

Your Optimal Health Centre will take reasonable steps to ensure that your personal information which we may collect, use or disclose is accurate, complete and up-to-date.

2.9 Data security

Your Optimal Health Centre will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. We use technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect your privacy.

Your Optimal Health Centre will destroy or permanently de-identify any of your information which is in its possession or control and which is no longer needed for the purpose for which it was collected provided Your Optimal Health Centre is not required under an Australian law or court/tribunal or otherwise to retain the information.

2.10 Cross border disclosure

Your Optimal Health Centre may enter into arrangements with third parties to store data we collect or to access the data to provide services (such as data processing), and such data may include personal information, outside of Australia. Your Optimal Health Centre will take reasonable steps to ensure that the third parties do not breach the APPs. The steps Your Optimal Health Centre will take may include ensuring the third party is bound by privacy protection obligations which are the same (or substantially the same) as those which bind Your Optimal Health Centre and requiring that the third party has information security measures in place which are of an acceptable standard and approved by Your Optimal Health Centre.

3. HOW TO CONTACT YOUR OPTIMAL HEALTH CENTRE ABOUT PRIVACY ISSUES

3.1 Privacy Officer

If you have questions or comments about this Privacy Policy, you can contact us:

By letter:	Your Optimal Health Centre 45 Fairy Street Bell Post Hill Victoria 3215
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By email:	info@youroptimalhealthcentre.com.au
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By telephone:	(03) 4250 9892
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Attention: Privacy Officer

3.2 Complaints

If:

Your Optimal Health Centre does not agree to provide you with access to your personal information; or

you have or a complaint about our information handling practices,

you can lodge a complaint with or contact our Privacy Officer on the details above or directly with the Office of the Australian Information Commissioner. Full contact details can be found on the website www.oaic.gov.au

4. HOW YOUR OPTIMAL HEALTH CENTRE HANDLES YOUR PERSONAL INFORMATION WHEN YOU VISIT OUR WEBSITE

This section of our Privacy Policy explains how we handle your personal information which is collected from our website: www.youroptimalhealthcentre.com.au or the website of any of the facilities associated with the Australian Centre for Integrative Medicine and Your Optimal Health Centre group of companies (collectively website hereafter).

4.1 Collection

When you use our website, we do not attempt to identify you as an individual user and we will not collect personal information about you unless you specifically provide this to us.

Sometimes, we may collect your personal information if you choose to provide this to us via an online form or by email, for example, if you:

- complete your pre-treatment form online;
- upload personal information into a Your Optimal Health Centre email;
- submit a general enquiry via our contacts page;
- register for an event or request information; or
- send a written complaint or enquiry to our Privacy Officer; or
- register for access to an online portal or forum.

When you use our website, we may use analytics tools such as Analytics to record and log for statistical purposes and abuse/fraud prevention purposes the following information about your visit, such as:

- your computer Internet Protocol address;
- your top level domain name (for example, .com,.gov, .org, .au etc);
- the date and time of your visit;
- the pages and documents you access during your visit; and
- the version of web browser you are using.

Our web-site management team may use statistical data collected by Analytics to evaluate the effectiveness of our web-site.

Analytics have browser “add-ons” that prevents Analytics from collecting information about web site visits, we suggest you refer to the instructions for installation of Analytics Opt-out to learn more about this.

We are, however, obliged to allow law enforcement agencies and other government agencies with relevant legal authority to inspect our web server logs, if an investigation being conducted warrants such inspection.

4.2 Cookies

A "cookie" is a small bit of data our server sends to your browser that allows our server to identify and interact more effectively with your computer. Cookies do not identify individual users, but they do identify your ISP and your browser type.

Your Optimal Health Centre websites may use cookies. This means that upon closing your browser, the cookie assigned to your computer or device may remain active to enhance your use of the website when you return to the website.

Personal information such as your email address is not collected unless you provide it to us. We do not disclose domain names or aggregate information to third parties other than agents who assist us with this website and who are under obligations of confidentiality. You can configure your browser to accept or reject all cookies and to notify you when a cookie is used. We suggest that you refer to your browser instructions or help screens to learn more about these functions. However, please note that if you configure your browser so as not to receive any cookies, a certain level of functionality of the Your Optimal Health Centre website and other websites may be lost.

4.3 Links to third party websites

We may create links to third party websites. We are not responsible for the content or privacy practices employed by websites that are linked from our website.

4.4 Use and disclosure

We will only use personal information collected via our website for the purposes for which you have given us this information.

We will not use or disclose your personal information to other organisations or anyone else unless:

- you have consented for us to use or disclose your personal information for this purpose;
- you would reasonably expect or we have told you (including via this policy) that your information is usually or may be used or disclosed to other organisations or persons for a related (or for sensitive information, a directly related purpose);
- the use or disclosure is required or authorised by law;
- the use or disclosure will prevent or lessen a serious and/or imminent threat to somebody's life, health or safety or to public health or public safety; or
- the disclosure is reasonably necessary for law enforcement functions or for the protection of public revenue.
- If we receive your email address because you sent us an email message, the email will only be used or disclosed for the purpose for which you have provided and we will not add your email address to an emailing list or disclose this to anyone else unless you provide us with consent for this purpose.

4.5 Data quality

If we collect your personal information from our website, we will maintain and update your information as reasonably practical and necessary or when you advise us that your personal information has changed.

4.6 Data security

Your Optimal Health Centre is committed to protecting the security of your personal information. We use technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect the privacy of information. We will take all reasonable steps to prevent your information from loss, misuse or alteration.

If you choose to complete our online forms or lodge enquiries via our website, we will ensure that your contact details are stored on password protected databases.

Staff members associated with website maintenance have access to our website's backend system. This is password protected. Our website service is also password protected.

4.7 Access and correction

If you wish to obtain information about how to access or correct your personal information collected via our website, please refer to Access and Correction at item 2.7 of this document

SCHEDULE

This Privacy Policy applies to the Australian Centre for Integrative Medicine and Your Optimal Health Centre group of companies which are associated with all our Australian facilities and includes Your Optimal Health Centre and Dr I.V.E Tabrizian Pty Ltd.

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YOUR OPTIMAL HEALTH CENTRE CONDENSED PRIVACY STATEMENT

Your Optimal Health Centre is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) and other relevant laws about how private health service providers handle personal information (including but not limited to patient health information).

We are committed to complying with all applicable privacy laws which govern how Your Optimal Health Centre collects, uses, discloses and stores your personal information.

This Privacy Statement sets out in brief how Your Optimal Health Centre facilities will handle your personal information. For further information or to receive a copy of our full Privacy Policy, please ask a staff member, visit our website: www.youroptimalhealthcentre.com.au or telephone the Your Optimal Health Centre facility and ask to speak with our Privacy Officer. You can also write to our Privacy Officer to request more information.

In respect of Patients, Your Optimal Health Centre will collect your personal information for the purpose of providing you with health care and for directly related purposes. For example, Your Optimal Health Centre may collect, use or disclose personal information:

- For use by a multidisciplinary treating team;
- Assessment for provision of health care services;
- To liaise with health professionals, care coordinator, Medicare, your health fund or other third party payer;
- In an emergency where your life is at risk and you cannot consent;
- To manage Your Optimal Health Centre facilities, including for processes relating to risk management, safety and security activities and quality assurance and accreditation activities;
- For the education of health care workers or the placement of students or trainees at Your Optimal Health Centre facilities;
- To maintain medical records as required under our policies and by law; or
- For other purposes required or permitted by law.

In respect of other individuals, Your Optimal Health Centre will collect your personal information in order to engage with you in your dealings with Your Optimal Health Centre and for other related purposes.

Personal information may be shared between Your Optimal Health Centre facilities to coordinate your care. We also outsource some of our services. This may involve us sharing your personal information with third parties. For example, we outsource the conduct of our patient satisfaction surveys to a contractor who may write to you seeking feedback about your experience with Your Optimal Health Centre.

We may outsource information and data storage services (including archiving of medical records), which may involve storing that information outside of Australia. Where we outsource our services we take reasonable steps in the circumstances to ensure that third parties, including organisations outside of Australia, have obligations under their contracts with Your Optimal Health Centre to comply with all laws relating to the privacy (including security) and confidentiality of your personal information.

Your Optimal Health Centre will usually collect your personal information directly from you, but sometimes may need to collect it from a third party. We will only do this if you have consented or

where it is not reasonable or practical for us to collect this information directly from you (for example, in relation to a patient, your life is at risk and we need to provide emergency treatment).

We will not use or disclose your personal information to any other persons or organisations for any other purpose unless:

- You have consented;
- For patients/clients, the use or disclosure is for a purpose directly related to providing you with health care and you would reasonably expect us to use or disclose your personal information in this way;
- For other individuals, the use or disclosure is for a purpose related to providing you with services and you would reasonably expect us to use or disclose your personal information in this way;
- We have told you that we will disclose your personal information to other organisations or persons; or
- We are permitted or required to do so by law.

You have the right to access your personal information that we hold about you (for patients, this includes health information contained in your health record). You can also request an amendment to personal information that we hold about you should you believe that it contains inaccurate information.

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