

Privacy Policy

1. Privacy Policy

This Privacy Policy applies to the collection, storage, use and disclosure by Integrated Medical Services Pty Ltd (ABN 35 602 157 157) (**IMS, we, us**) of your Personal Information. It also provides information on how you can obtain access to or seek correction of your Personal Information. IMS is committed to the protection of Personal Information and has developed this Privacy Policy in line with the 'Australian Privacy Principles' in the *Privacy Act 1988* (Cth).

You agree that providing us with your Personal Information when you complete a form and / or when you use our websites (**Websites**):

- www.actr.com.au
- www.controlphysio.com.au
- www.farnorthrenal.com.au
- www.imedservices.com.au
- www.isrobotics.com.au
- www.responseoncology.com.au,
- www.plexushaematology.com.au

Implies your consent to the collection and use of your Personal Information in accordance with this Privacy Policy. We may change this Privacy Policy from time to time. Your continued use of our services and use of the Websites following any such changes to the Privacy Policy will confirm your acceptance of the changes.

2. Background

IMS is comprised of a team of Medical Practitioners, Allied Health, nurses and medical secretaries as well as reception and administrative staff.

We provide administrative and health services to individual practitioners, and we also provide administrative and health services through entities including, but not limited to, our private clinics, the Cairns Private Hospital, the Cairns Day Surgery, the Cairns Base Hospital, the Cairns Central Day Hospital, The Wesley Hospital, Greenslopes Hospital and Radiation Oncology Centres 'ROC'.

We are also associated with:

Australian Clinical Trials and Research
Benefit Nutrition
Control Physiotherapy
Dr Elizabeth Jackson
Far North Renal Services
HK Surgical
Institute of Surgical Robotics
myPrehab
Northern Urology
Plexus Haematology
Response Oncology

To allow us to offer the services to the individuals and entities listed above, we utilise central support services in which the Personal Information we collect from you is accessed and stored. You acknowledge and agree that if you provide your Personal Information to one of the individuals or entities associated with us, your Personal Information will be available on the central support system.

3. What Personal Information Do We Collect?

We only collect personal information that is reasonably necessary for us to provide you with the services you have requested. We collect personal information, health information and sensitive information (collectively, **Personal Information**) as defined in the Australian Privacy Principles. The type of personal information we may collect from you includes, but is not limited to, your contact information such as your full name, email address, current postal address, and telephone and fax numbers. We may also collect health and sensitive information from you including your medical history, family medical history, current lifestyle information and ethnic background.

When providing your Personal Information to us, some information may be identified as mandatory or voluntary. If you do not provide the mandatory data, we may not be able to effectively provide our services to you.

4. How is Your Personal Information Collected?

In most cases we will collect your Personal Information directly from you. This may take place face-to-face, through the completion of documents such as administrative forms or DocuSign electronic forms, by way of emails, telephone calls, through the Websites, or through the use of apps (such as Google Apps) on mobile devices.

The collection, storage, use and disclosure of Personal Information through DocuSign and Google Apps are subject to the Privacy Policies of DocuSign and Google Apps which are available at <https://www.docusign.com.au/company/privacy-policy> and <https://www.google.com/policies/> respectively.

We may also collect your Personal Information from your treating health practitioners, hospitals, and government agencies.

The collection of this personal information is required to enable us to provide the services to you and to ensure the highest quality of service provision. Individuals do not have to supply IMS with their Personal Information, however, if the individual chooses not to do so IMS may be unable to provide the services required or sought. We also collect this information from publicly available websites, directories and databases including, but not limited to, Twitter, other social media and the survey tool SurveyMonkey.

5. How Do We Store and Protect Your Personal Information?

From time to time we may store your Personal Information in any combination of data storage facilities, cloud computing facilities or paper based files which may be operated or held by us or by third party service providers under a contractual agreement. Encrypted copies of our servers and all associated data may also be held offsite as a backup. We take all reasonable endeavours to maintain the security of your Personal Information from unauthorised access, modification or disclosure. We cannot ensure or warrant that your Personal Information will always be secure during transmission or protected from unauthorised access during storage therefore you provide your Personal Information to us at your own risk. Please contact us immediately if you become aware or have reason to believe there has been any unauthorised use of your personal information.

We may use DropBox to store your Personal Information for transcription and to allow us to access large files. The storage, use and disclosure of Personal Information through DropBox is subject to DropBox's Privacy Policy which is available at <https://www.dropbox.com/privacy>

We utilise LogiQC as our Quality Management System which may host your Personal Information. The storage, use and disclosure of Personal Information through LogiQC is subject to LogiQC's Privacy Policy which is available at <http://logiqc.com.au/privacy-policy/>

We use DocuSign, Google Apps, Asana and SurveyMonkey to store your Personal Information. The storage of Personal Information through DocuSign, Google Apps, Asana and Survey Monkey is subject to the Privacy Policies of these entities which are available at:

- DocuSign: <https://www.docusign.com.au/company/privacy-policy>
- Google Apps: <https://www.google.com/policies/>
- Asana: <https://asana.com/terms/#privacy-policy>
- SurveyMonkey: <https://www.surveymonkey.com/mp/policy/privacy-policy/>

The Websites are hosted by [siteground.com](https://www.siteground.com). The storage, use and disclosure of Personal Information through SiteGround is subject to SiteGround's Privacy Policy which is available at:

<https://www.siteground.com/privacy.htm>

6. How do we use and disclose your Personal Information?

We will use and disclose your Personal Information in order to provide you with the services requested by you. You hereby consent to IMS:

- Contacting you to ask you to provide feedback about the services provided;
- Using your Personal Information to perform administrative functions and activities in relation to our services and the Websites;
- Disclosing your Personal Information to My Health Record if you have registered and provided standing consent;
- Disclosing your Personal Information to other health professionals involved in your care if it is necessary to be able to provide you with the service or information that you requested, you have agreed to us providing it to other health professionals involved in your care or it is already publicly available information;
- Using your Personal Information to improve our services or the Websites and to develop new products or services which may involve performing analytics on information that we collect automatically;
- Disclosing the Personal Information IMS collects to third parties we engage to perform functions or provide products and services on our behalf such as processing credit card information, letter transcription and dispatch;
- For billing purposes, sharing relevant aspects of your Personal Information with third parties such as your other health care providers, Medicare, your private health insurance fund and, if necessary, external collection agencies;
- Using your Personal Information to respond to enquiries you make regarding the services and / or the Websites;
- Using your Personal Information to comply with any applicable laws or if disclosure will prevent or lessen a serious or imminent threat to your life or health or the life of someone else; and
- Disclosing your Personal Information, with your consent, to another person including any person you have authorised disclosure to or a person exercising an enduring power of attorney which has been provided to IMS.

All patients are provided with an opportunity to decline or to indicate what types of information or services they are interested in receiving further information about. If you decide that you do not wish to receive information from us, or you wish to change your preferences in relation to receipt of future

material, please contact us by emailing the General Manager at admin@imedservices.com.au We will endeavour to remove your details from our mailing database within 20 business days of receipt of notice.

We may use Asana for internal communications between doctors and support staff, for project management and task tracking. The storage, use and disclosure of Personal Information through Asana is subject to Asana's Privacy Policy which is available at:

<https://asana.com/terms/#privacy-policy>

We may also use SurveyMonkey as a survey tool for patient surveys and evaluations. The collection, storage, use and disclosure of Personal Information through SurveyMonkey is subject to SurveyMonkey's Privacy Policy which is available at:

<https://www.surveymonkey.com/mp/policy/privacy-policy/>

We will not send you direct marketing material.

If at any time you have a concern about the material you have received from us, or you wish to change your preferences in relation to receipt of future material, please contact us by emailing the General Manager at admin@imedservices.com.au.

7. How can you access, amend or delete your Personal Information?

We will use all reasonable endeavours to keep your Personal Information accurate, complete, up-to-date, relevant and not misleading. Please contact us to examine your Personal Information if required and we will provide a complete list of your Personal Information within 20 business days of receipt of your request. You may contact us on 07 4242 5030 or at admin@imedservices.com.au to amend any of your personal information that is inaccurate, incomplete or out-of-date or request that your Personal Information be deleted. We will amend your records as requested within a reasonable period of receipt of notice. If applicable, any legal requirement on us to maintain certain records of your Personal Information shall prevail over any of your requests. If you request that we delete your Personal Information we will consider your request having regard to our legal obligations. We may refuse to delete your Personal Information however, in such circumstances, we will amend your Personal Information to include reference to the fact that you have asked for the specific Personal Information to be deleted. IMS may require identification to be provided before releasing copies of Personal Information.

You may be required to make payment of costs if you require access, amendment and / or deletion of your Personal Information. You acknowledge that the amount of the payment of costs will be at our discretion.

8. Anonymity

You may seek to remain anonymous or use a pseudonym when you deal with us. However, there may be circumstances where we are required or authorised by law to only deal with you if you have identified yourself or it is impracticable for us to deal with you without you identifying yourself.

9. Disclaimer

We will only collect, use or disclose information that personally identifies you in accordance with this Privacy Policy, unless we are required to disclose it by law, or in our opinion we are required by disclose it to protect the rights or property of us or any third party or to avoid injury to any person.

10. Cross Border Disclosures

Your Personal Information and payments may be disclosed overseas via the Websites through data centres which are hosted in the United States of America, Italy, the United Kingdom, Netherlands and

Singapore. Your Personal Information and payments may also be disclosed overseas through our use of services including, but not limited to, DocuSign, Google Apps, Asana, SurveyMonkey, DropBox, LogiQC and SiteGround which may be hosted in the United State of America, Italy, the United Kingdom, Netherlands and Singapore.

11. Mandatory Data Breach Notifications

From February 2018, pursuant to the *Privacy Act 1988*, we will be required to notify you and the Information Commissioner if we suspect that a data breach (relating to your personal and / or health information) has occurred and there is real risk of serious harm to you as a result of the breach.

12. Applicable Law

This Privacy Policy will be governed by and construed in accordance with the laws of Australia. You irrevocably and unconditionally submit to the exclusive jurisdiction of the courts of Australia. If any provision of this Privacy Policy is found to be invalid or unenforceable by a court of law, such invalidity or unenforceability will not affect the remainder of this Privacy Policy which will continue in full force and effect.

13. Contact Us

Please do not hesitate to contact us in relation to your Personal Information by way of one of the following:

Email: darcy@imedservices.com.au [General Manager]

Phone: 07 4242 5030

Fax: 07 4242 5031

Mail: Level 1, 189 Abbott Street, Cairns, QLD, 4870

We will endeavour to address your enquiry within 5 business days of receipt of your enquiry.

14. Making a Complaint

If you have any concerns about how we manage your personal information, you may write to our Privacy Officer at admin@imedservices.com.au. We will reasonably endeavour to provide a response within 30 days of receipt of your complaint.

If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) by writing to the OAIC at GPO Box 5218, Sydney NSW 2001. For further information about the OAIC, please visit www.oaic.gov.au.

Last Updated: 22nd March 2018