

Privacy Statement – Integrated Medical Services

Integrated Medical Services (IMS, we or us) is committed to protecting the privacy of your personal information. We take our responsibility for handling sensitive personal information seriously and we have put measures in place to maintain the integrity of personal information and provide full transparency on conduct. We are bound by the Australian Privacy Principles under the *Privacy Act 1988* (Cth) (**Privacy Act**) about how we handle your personal information.

This Privacy Policy sets out how and why IMS collects, stores, uses and discloses your personal information, and how to contact us if you have any questions about how we handle your personal information or would like to access the personal information we hold about you.

IMS provides a range of health services that are primarily provided to you through IMS healthcare facilities (**IMS Group**). The services we offer can be found on our website. We are constantly evolving our services, and new services may be offered from time to time.

What information does IMS collect?

The personal information we collect depends on which of our services you use and the information you choose to provide. IMS will only collect information which is necessary to facilitate provision of health care services by a member IMS to you or to manage, conduct and oversee the Hospital's businesses.

When you use our services, you may choose to provide to IMS, and we may collect personal information such as:

- your name;
- your date of birth;
- your contact details (e.g. address, email address, phone number);
- your gender;
- your marital status;
- occupation;
- cultural background;
- allergies;
- your medications;
- your emergency contact details;
- your next of kin details;

- advance health directive;
- the type of appointment you are requesting;
- information obtained through the My Health Record platform;
- medical history;
- personal details including family history, ethnic background, education, occupation, lifestyle, NOK details;
- information and medical records from your other medical practitioner where you have consented for that information or medical records to be transferred to us;
- the reason you are seeking that type of appointment;
- information about your private health insurance fund, including your membership number;
- your Medicare, Pension, Health Care Card and Veteran Affairs number and details;
- your photograph or image;
- financial information;
- transaction information;
- technical data such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the IMS Network; and
- analytics data which we may collect directly or use third party analytics tools, to help us measure traffic and usage trends for our products and services. These tools collect information sent by your browser or mobile device, including the pages you visit and other information that assists us in improving our products and services. We collect and use this analytics information in aggregate form such that it cannot reasonably be manipulated to identify any particular individual user.

If you choose to use our booking system for appointments with practitioners, we may collect information from you as provided by your referring health professional regarding your treatment such as copies of referral letters which may include relevant medical history, symptoms, investigation results, medication and management, and other health information.

If you are a referring health practitioner, we may collect information about you and your practice such as name, contact details, provider number and information relevant to providing services to referred patients.

We may also collect your Medicare details and number, pension/health care card/DVA and/or private health insurance membership details, to assist with the above services (for example, to facilitate your booking of appointments with health professionals, and to help confirm your identity for our services).

How we collect your personal information

Usually we collect your personal information directly from you. IMS may collect your personal information from you in various ways, including via telephone and email.

We may also collect information from third parties, such as:

- family members, legal guardian/s and/or a person you have authorised to provide your personal information to us;
- another health service provider;
- health professionals and their practices (often via their practice management software systems), in relation to the management of appointments you have made, your requested health services, and the associated fees.

We will only collect information from third parties where:

- you have consented;
- such collection is necessary to enable us to provide appropriate health care services;
- such collection is reasonably necessary to enable us to appropriately manage, conduct and oversee hospital businesses;
- we are permitted or required to do so by law.

We use cookies and similar technologies (such as web beacons and proprietary measurement software) on the IMS Network to analyse trends, administer our services, diagnose problems, improve the quality of our products and services, track users' movements around the IMS Network, and to gather demographic information about our user base as a whole.

A cookie is a small text file that the IMS Network may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of the IMS Network for any of your future visits to the IMS Network.

We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the IMS Network. You may refuse to use cookies, web beacons or some of the proprietary measurement software features by selecting the appropriate settings on your browser or the settings section of your mobile or tablet device. However, please note that if you do this, you may not be able to use the full functionality of the IMS Network.

You do not have to use our services, and you may choose which of our services you wish to use. Some of our services do not require you to provide us with personal information. However the majority of our services do, and when you use such services, we require you to provide accurate details and do not permit you to use a pseudonym or remain anonymous.

For some services, certain information is designated as mandatory (which is required to use the service) and some is optional (which you may choose not to provide, but your failure to provide that information may limit your use of the service). If you do not provide personal information to IMS that is designated as mandatory, we will be unable to provide you with that service.

IMS uses both internally built software and third party vendors (such as Google Analytics and Halaxy) for the collection, aggregation and analysis of some survey data. The information you provide is stored in a secure data warehouse in Australia and is accessed by IMS in accordance with a third party vendor's privacy policy.

Why does IMS collect and use your personal information?

The primary reason IMS uses your personal information is to provide the services you have elected to receive. This primary purpose includes:

- Facilitate the provision of health care services to you by the IMS Clinical Team including doctors, specialists and Visiting Medical Officers (VMOs).
- Facilitate the provision of any ongoing health related services to you.
- Appropriately manage, conduct, IMS Hospital businesses including insurance requirements, conducting audits, and undertaking accreditation processes.
- Appropriately manage, conduct IMS Hospital businesses, including quality assurance programs, billing, improving its services, implementing appropriate security measures.
- Maintain appropriate records of current staff personnel, assess and process applications of prospective employees and general Human Resources activities.

IMS may also use your personal information:

- to contact you about your use of the IMS Network;
- to facilitate communications between you and health professionals such as to remind you of an upcoming appointment, to confirm a booking, or to request feedback or participate in a survey or questionnaire;
- on a de-identified basis for analysis, research and quality assurance purposes;
- when you have provided prior agreement, for communicating with you about our products and services and those of third parties which we believe may be of interest to you. You will be able to stop receiving these communications at any time by:
 - clicking on the "Unsubscribe" link on email correspondence;
 - replying "Stop" to SMS correspondence; or
 - emailing admin@imeservices.com.au;
- to send push notifications to your mobile device. You can use the settings on your mobile device to enable or turn off mobile push notifications from IMS;
- to pre-fill forms;
- to report to health professionals and their practices about the use and functionality of our services, including associated financial benefits;
- for security measures to implement access controls, monitor activity that we think is suspicious or potentially fraudulent, and to identify violations of this Privacy Policy or our Terms of Use;

- for payment processing; and
- for other purposes that are notified to you at the time we collect your information, which you give your consent to, or which are authorised or required by law.

Who does IMS disclose personal information to?

We will disclose your personal information to the health professionals that treat you at an IMS facility.

IMS may also disclose your personal information to other persons, such as:

- medical and other healthcare professionals involved in your care;
- government agencies, such as the Department of Defence or the Department of Veterans' Affairs;
- government departments responsible for health, aged care, and disability;
- third parties contracted to provide services to IMS such as entities contracted to assist in accreditation or survey processes;
- private health insurance providers and Medicare Australia;
- third party service providers (such as IT and software service providers, providers of research services, payment processing service providers, third parties that collect and process data such as Google Analytics, security entities that minimise risks and block suspicious behaviour such as Google reCAPTCHA, and our professional advisers such as lawyers and auditors), but only for the purpose of providing goods or services to us;
- research and measurement companies which record internet usage across the IMS Network;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- other persons notified to you at the time we collect your personal information, who you give your consent to, or to whom we are authorised or required by law to make such disclosure.

We may also disclose de-identified information of our users to third parties for analysis, research and quality assurance purposes.

Some third party service providers used by IMS may store your personal information on servers located overseas, however, they must also meet our requirements for privacy and data security.

Data quality and security

IMS will take reasonable steps to ensure that your personal information which we may collect, use or disclose is accurate, complete and up-to-date. However, we rely on the accuracy of the personal information as entered by you or provided to us by third parties.

IMS will take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure. IMS implements security measures including:

- physical security such as security procedures for access to our business premises; and
- IT security procedures including password protection, network firewalls, encryption, intrusion detection and site monitoring.

We store your personal information on secure servers located in Australia in an encrypted, electronic format.

Before disclosing personal information to an entity or person located overseas, IMS takes steps to ensure that the recipients of such information do not breach the APPs in relation to the information, by including relevant contractual provisions.

We will only retain your personal information for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or for legal purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we handle your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Access to, deletion of and correction of your personal information

You have a right to request:

- access to your personal information;
- that your personal information be deleted or de-identified;
or
- that we correct inaccuracies relating to your information.

In some circumstances, we may not be able to comply with a request that you make in respect of your personal information. For example, we may be required to retain certain information that you ask us to delete for various reasons, such as where there is a legal requirement to do so. Where these reasons to refuse a request in respect of your personal information exist, we will advise you of those reasons at the time you make your request.

If we do agree to your request for the deletion or de-identification of your personal information, we will delete or de-identify your data but will generally assume that you would prefer us to keep a note of your phone number on a register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data is collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

If you request that your personal information is changed, and if IMS does not agree to change your personal information, we will enclose your statement of the requested changes with your personal information.

If you would like to obtain access to, delete or request changes to your personal information you can ask our Privacy Officer (details below).

IMS can charge a reasonable fee for the time and cost of collating, preparing, and photocopying material for you if you request access to your personal information.

Where we have obtained your consent to handle your personal information, or consent to send you information, you may withdraw your consent at any time and we will cease to carry out the particular activity that you previously consented to, unless we consider that there is an alternative reason to justify our continued handling of your personal information for this purpose, in which case we will inform you of this condition.

Complaints

IMS has established processes for managing Complaints relating to Privacy. All complaints relating to Privacy must be directed to the Director of Nursing.

If you are not satisfied with management and response of the complaint, you may request that the complaint be reviewed by the Operations Manager.

We will respond in writing within 30 days of receipt of a complaint. If you are not satisfied with our decision, you can contact us to discuss your concerns.

If the complaint remains unresolved, you have the option of notifying the Office of the Australian Information Commissioner (OAIC). Contact details can be found at OAIC's website: www.oaic.gov.au

How to contact us:

Director of Nursing
Level 3, 58 McLeod Street, Cairns, QLD
T: 07 4242 5100
E: don@fndh.com.au

Operations Manager
Level 3, 58 McLeod Street, Cairns, QLD
T: 07 4242 5100
E: operations@fndh.com.au

Office of the Australian Information Commissioner
T: 1300 363 922
T: +61 2 9284 9749 (if calling from outside Australia)

If you are deaf or have impaired hearing or speech you can contact the Commissioner through the National Relay Service

- Teletypewriter (TTY) users' phone 133 677 then ask for 1300 363 992.
- Speak and Listen users' phone 1300 555 727 then ask for 1300 363 992.
- Internet relay users connect to the National Relay Service then ask for 1300 363 992.

If you do not speak English or it is your second language and you require assistance to communicate you can contact the Translating and Interpreting Service on 131 450, then request 1300 363 992.