

PRIVACY POLICY

What is this Policy all about?

Coastal Dental Care (CDC) appreciates the importance of privacy and is committed to the management of your personal and health information in a way which upholds your privacy rights.

The *Privacy Act 1988* (Privacy Act) has 13 Australian Privacy Principles (APP) relating to the handling of personal information. Personal information is any information or an opinion that identifies you or could identify you, and includes information about your health. Unless indicated otherwise:

- “Information” in this Policy refers to your personal and health information as defined in the Privacy Act;
- “CDC”, “we”, “our” and “us” are the dental practices that trade under the “Dental Care” name as part of CDC, and include the service providers that carry on business from the dental practices; and
- “Dental practitioner” includes dentists, dental hygienists, oral health therapists, dental technicians, dental prosthetists and dental therapists.

This Policy outlines how we manage your information.

Why do we manage your information?

We manage your information for the primary purpose of delivering dental services to you, and a related purpose of carrying on our business.

What information do we collect?

The types of information that we collect include:

- Name and contact details, date of birth, health insurance details, medical history, and details about your current health and prescriptions/medications;
- Medicare information and information from other bodies that may fund your dental care;
- Notes taken by dental practitioners about your symptoms, medical history and dental health, and dental practitioner’s observations and opinions about your dental health;
- Your patient file held by us, as well as your patient file held by other dental practices;
- Insurance claims, such as motor vehicle and workers’ compensation;
- Credit card and other payment details;
- Video and photographs in which you can be reasonably identified;
- Communications sent or received by you or us which contains your information; and
- Any reports associated with the provision of dental services.

How do we collect your information?

We collect your information in a number of ways, including when you:

- Attend our dental practices;
- Complete electronic and hard copy forms, including Medical/Dental History Forms;
- Communicate with our employees or dental practitioners in the course of dental services;

- Contact us by phone, e-mail or other communication medium;
- Submit your information through our website (<http://www.coastaldentalcare.com.au>) or through our social media tools as part of an inquiry, competition or other promotion;
- Subscribe to our materials; and
- Provide written consent for us to collect your information from other dental practitioners.

We may also collect your information from third parties such as other dental practitioners who are treating or have previously treated you, other health practitioners, health insurance providers, Medicare, and government bodies. In particular circumstances, we may collect your information from a legal guardian or other person who has the authority to do so.

How do we use and disclose your information?

We will use and disclose your information in the following ways:

- Create, access, read and maintain your patient file;
- Devise a treatment plan for you;
- Respond to your inquiries through any communication medium, including our website and social media tools;
- Update your information, such as contact details, and inform other service providers of your updated information;
- When we refer you to another service provider (e.g. specialist or laboratory);
- Prepare invoices, process payments and institute debt recovery procedures;
- In the course of our management, information technology, marketing, administrative, funding, complaint-handling, planning, evaluation, quality assurance and audit activities;
- Access and process insurance claims (including private health) and Medicare claims;
- Contact you in relation to dental services provided, and to be provided, by us;
- Finalise a dental appointment for you;
- Provide general information about our dental practices and the services we provide;
- If authorised or required under an Australian law or a court/tribunal order; and
- When a document, signed by you, is received by us from a dental practitioner requesting your patient records.

We may disclose your information to parties that are associated with our provision of dental services including: our employees; other health service providers which are involved with your dental treatment; professional advisors (e.g. lawyers, insurers, accountants, dental specialists); IT service providers; emergency contacts; government bodies; and other third parties with your consent (express or implied). It is unlikely that we will disclose your information to overseas recipients.

Can we use your information for direct marketing and online marketing?

We may use your information for the purpose of providing you with material about our services (direct marketing material). Please contact us (refer to CDC Contact Details in this Policy) if you do not wish to receive direct marketing material.

When you access our website, we may use cookies or other tracking technologies as part of our online marketing activities. Any data generated from the use of these technologies is aggregated and

does not identify you. Cookies are small pieces of data stored on your computer by your web browser. For example, cookies can be used by us to improve your experience with our website, and to track your activity on our website for the purpose of advertising our services to you on other websites (e.g. FaceBook). You can disable the cookies through the settings in your web browser.

How is my information protected?

The practices we adopt to protect and secure your information depend on the type of information we collect and how we collect your information. For example, your health information collected in hard copy is scanned into your electronic patient file, and the hard copy is then destroyed. When we collect and update information about your medical and dental history using a laminated form, we scan the information into your electronic patient file and we then remove your information from the form. Your health information collected through an online form is secured by an SSL certificate, which is designed to prevent unauthorised third party access. With respect to our database that stores all patient files, each dental practitioner and employee has an individual username and password, with different access levels, and this creates an audit trail that can be tracked by us in the event of unauthorised access, modification or disclosure.

We cannot guarantee the security of your information when you use our website and social media tools, as the internet is not a secure vehicle for transmitting information. If you have any concerns about disclosing your information over the internet but have an inquiry about our dental services, please contact us via e-mail, telephone, post or fax using the CDC Contact Details below.

How can I access my information?

You can request access to your information using the CDC Contact Details in this Policy. We may require you to provide the request in writing, as well as evidence verifying your identity or that you have authority to request access (e.g. legal guardian). We will provide you access to your information in the way that you request, unless it is unreasonable or unpractical to do so. Access may also be refused in particular situations set out in the APP, including where access would pose a risk to health and safety, the privacy of others and if refusal is permitted by a Court or Tribunal order. If access is refused, we may still be required to provide access to your information in another form which is reasonable and practical (e.g. providing a USB with your information as opposed to copies). We may charge you a reasonable fee for providing access to your information.

How can I correct my information?

We will take reasonable steps to correct your information if it is inaccurate, incomplete, out-of-date, irrelevant or misleading ('incorrect'). For example, we verbally check that your contact details are correct during each visit to our dental practice and we request an update from you about your medical history on at least a bi-annual basis. Despite the steps we take, your information can change between visits. As such, it is your responsibility to notify us of any changes to your information so that we can update our records.

You can request a correction to your information and for us to notify other service providers (e.g. external specialists and head office) about the corrections. The request can be made at our dental practices or using the CDC Contact Details in this Policy. We can only refuse a request if we are satisfied that your information is correct, or it is not practical or lawful to change your information.

How can you contact us about a concern related to privacy?

There are a number of ways that you can contact us if you have any questions, concerns or a complaint about the matters covered in this Policy or how we handle your information. A matter includes if you disagree with a decision made by us concerning the privacy of your information, such as a refusal to correct or provide access to your information. Unless there are exceptional circumstances, we will take reasonable steps to respond to you within 30 days of receipt.

If you are not satisfied with our response to your complaint, you may contact the Office of the Australian Information Commissioner (<https://www.oaic.gov.au>)

CDC Contact Details

Coastal Dental Care

Phone: (07) 5539 7400

Fax: (07) 5539 7499

E-mail: cdc@coastaldentalcare.com.au

Post: PO Box 9074, Gold Coast Mail Centre QLD 9726

Head office: Suite 18 Level 8 Premion Place, 39 White Street, Southport QLD 4215