

## PRIVACY POLICY

Perfect Medical Care, ABN 15 643 789 502 ("we," "our," or "us") recognises the importance of your privacy and respects your right to control how your personal information is collected and used.

We are an APP Entity as defined in the Privacy Act 1988 (Cth) (the "Act"). This privacy policy is aligned with the Australian Privacy Principles as set out in the Act.

This Privacy Policy applies to our website, <https://www.perfectmedicalcare.com.au> (the "Site") which is operated by us, and to the products and services provided by us.

### **Background and Rationale**

The Australian Privacy Principles (APP) provide a protection framework that supports the rights and obligations of collecting, holding, using, accessing and correcting personal information.

The APP consists of 13 principle-based laws and apply equally to paper-based and digital environments. The APP complement the long-standing general practice obligation to manage personal information in a regulated, open and transparent manner.

### **Collection of Information**

The Practice will need to collect personal information as provision of clinical services to a patient at the Practice. Collection of personal information is for the primary purpose of managing a patient's healthcare, financial claims and payments. This information is not required or authorised by law but will be used to assist us in providing appropriate care/services.

Collected personal information will include patients:

- Names, addresses and contact details
- Medicare number (where available) for identification and claiming purposes
- Healthcare identifiers
- Medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors.

A patient's personal information may be held at the Practice in various forms:

- As paper records
- As electronic records

The Practices procedure for collecting personal information is set out below.

Practice staff collect patients personal and demographic information via registration when patients present to the Practice for the first time. Patients are encouraged to pay attention to the collection statement within the form and the information about the management of collected information and patient privacy.

During the course of providing medical services, the Practices healthcare practitioners will consequently collect further personal information.

Personal information may also be collected from the patient's guardian or responsible person (where practicable and necessary), or from any other involved healthcare specialists.

The Practice holds all personal information securely, whether in electronic format, in protected information systems or in hard copy format in a secured environment.

### **Consequences of not collecting your personal information**

Limited or incomplete personal information may result in poorer quality of service provided to you or a denial of service.

### **Definition of a Patient Health Record**

A *patient health record* is a collection of information about a patient's health history, medical conditions, treatments, and care received within our practice. This includes personal details such as name, date of birth, contact information, medical diagnoses, medications, test results, clinical notes, referral information, and any other relevant health-related data. The health record may be in electronic or paper form.

### **Use and Disclosure of Information**

Personal information will only be used for the purpose of providing medical services and for claims and payments, unless otherwise consented to. Some disclosure may occur to third parties engaged by or for the Practice for business purposes, such as accreditation or for the provision of information technology. These third parties are required to comply with this policy. The Practice will inform the patient where there is a statutory requirement to disclose certain personal information (for example, some diseases require mandatory notification).

The Practice will NOT disclose personal information to any third party other than while providing medical services, without full disclosure to the patient or the recipient, the reason for the information transfer and full informed consent from the patient. The Practice will not disclose personal information to anyone outside Australia without need and without patient consent.

Exceptions to disclose without patient consent are where the information is:

- Required by law
- Necessary to lessen or prevent a serious threat to a patient's life, health or safety or public health or safety, or it is impractical to obtain the patient's consent
- To assist in locating a missing person
- To establish, exercise or defend an equitable claim
- For the purpose of confidential dispute resolution process

The Practice will not use any personal information in relation to direct marketing to a patient without that patient's express consent. Patients may opt-out of direct marketing at any time by notifying the Practice in a letter or email. The Practice evaluates all unsolicited information it receives to decide if it should be kept, acted on or destroyed.

## **Data Protection and Confidentiality**

We are dedicated to protecting your personal and health information. All data, including electronic health records, telehealth consultations, and related information, are stored in a secure manner in compliance with applicable privacy laws and regulations. Access to this information is strictly limited to authorized personnel within our practice, who are trained to handle it in accordance with confidentiality requirements.

### **How long do we keep your personal information?**

We retain personal and health information in accordance with NSW health record retention laws. When information is no longer needed, we securely destroy or de-identify it, unless required by law to retain it longer.

## **Artificial Intelligence (AI) Transcription**

Your doctor may use an AI transcribing tool which captures audio of your consultation and transcribes the recording into relevant clinical notes for your medical records. It is used to assist with documenting your consultation, capturing only what is necessary for accurate medical records. Conversations are transcribed simultaneously while they happen, meaning no recordings are ever stored. Clinical notes generated are controlled by your doctor and added to your Health Record. Data handling practices adhere to the Australian privacy and healthcare regulations including the Australian Privacy Act 1988. The information management systems are ISO2001 accredited for data security. All data is encrypted, securely and confidentially stored on servers located within Australia to comply with local jurisdiction requirements. None of your data is used for secondary purposes. Data undergoes a rigorous de-identification process to remove personal identifiers. You may choose to revoke your consent at any stage by notifying staff or your doctor.

## **Anonymous Health Care**

You may request to remain anonymous when you seek health services from your doctor. While we endeavour to comply with any request to use your doctors' services anonymously or using an alias, there may be circumstances in which it is unlawful or unpracticable to do so.

Your health care will always remain our priority, and we are unable to provide services in circumstances where treating you anonymously may compromise your treatment or health outcomes. We cannot provide Medicare rebates or access to Veterans affairs entitlements without properly identifying you.

If you request to be seen anonymously you will also not be able to access the Pharmaceutical Benefits Scheme in the event you require any medication. We have a legal obligation under the Public Health Act, to report certain medical conditions. If your doctor diagnoses a prescribed medical condition, they must make a report, including your identity, to the Health Department.

## **Access & Corrections**

The Practice acknowledges patients may request access to their medical records. Patients are encouraged to make this request in writing, and the Practice will respond within a reasonable time.

The practice will take reasonable steps to correct personal information where it is satisfied, they are not accurate or up to date. From time to time, the Practice will ask patients to verify the personal information held by the Practice is correct and up to date. Patients may also request the Practice corrects or updates their information, and patients should make such requests in writing.

## **Data Breach Notification Scheme**

If we have reason to suspect a data breach has occurred, we will undertake an assessment in accordance with the Notifiable Data Breach Scheme. If we determine there has been an eligible data breach, we will notify you as soon as reasonably practicable.

If the breach relates to the My Health Records Act, we may disclose your personal information to the My Health Records System Operator under s 73A of that Act.

## **Third-party websites**

At times, our Site may contain links to other, third-party websites. Any access to and use of such linked websites is not governed by this Privacy Policy, but, instead, is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

## **Review and Updates to This Policy**

We will review this Privacy Policy regularly and update it as necessary to ensure it aligns with current practices, legal requirements, and technological developments. The review date of this Privacy Policy is indicated above. Any changes will be communicated to you in accordance with applicable law.

If you have any questions or concerns about our Privacy Policy or the handling of your personal or health information, please contact us at Perfect Medical Care.

## **Complaints and Enquiries**

If you have any questions or complaints regarding privacy, or if at any time you believe we may have wrongfully disclosed your Personal Information or breached our privacy policy, please contact us on 02 8964 7011 or lodge your complaint in writing to:

James Moran - Practice Manager  
Perfect Medical Care  
36 Blackwall Road, Woy Woy NSW 2256 or  
via email at [admin@perfectmedicalcare.com.au](mailto:admin@perfectmedicalcare.com.au)

If you are not satisfied with our response you are entitled to contact the Office of the Australian Information Commissioner, by phoning 1300 363 992 or writing to the Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 1042.

**Reviewed:** September 2025

**Next Review Date:** September 2026