

Privacy Policy: Gippsland Eye Centre

We take privacy very seriously and this Privacy Policy sets out how we manage your Personal Information. We comply with the *Privacy Act 1988* (Cth) ("**Privacy Act**") and the *Health Records Act 2001* (Vic) ("**Health Records Act**") (together the "**Acts**") and any other applicable privacy laws when handling Personal Information.

In this Privacy Policy:

- "**Technology**" means any Website or other technology operated by us, including <https://www.gippslandeyecentre.com.au>, social media and other communication forums.
- "**we**", "**us**" and "**our**" means Gippsland Eye Centre Pty Ltd A.C.N. 603 382 752 trading as "Gippsland Eye Centre" and any associated entities of that company, and each of them severally, and their related bodies corporate, associates and affiliates (**Associates**).
- "**Website**" means our website: <https://www.gippslandeyecentre.com.au>.

Consent

When you:

- access any of our services;
- make an appointment with us;
- provide your personal details to us;
- access the Technology;
- sign up to any of our mailing lists; or
- accept any terms and conditions that incorporate this Privacy Policy,

you agree to your Personal Information being handled in accordance with this Privacy Policy.

You are not required to provide Personal Information to us. However, if you do not provide us with all the information we request, you may not be able to benefit from our services or the services we provide to you may otherwise be negatively affected.

For example:

- by not providing information about the quality of your vision and any issues concerning your eyes, we will not be able to fully assess the health of your eyes and properly provide eye care services to you; and

- if you don't provide your full contact and identification details we may not be able to communicate with you about follow-up treatment and may not be able to access funds available to you through Medicare and other organisations on your behalf.

What is Personal Information?

Personal Information has the meaning given to that term in the Privacy Act as updated or amended from time to time, which is accessible [here](#). At the time of publishing this Privacy Policy the Privacy Act defines Personal Information as meaning 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.

Health Information has the meaning given to that term in the Privacy Act as updated or amended from time to time, which is accessible [here](#). At the time of publishing this Privacy Policy the Privacy Act defines Health Information as a subset of Personal Information. It includes:

- (a) information or an opinion about:
 - (i) the health, including an illness, disability or injury, (at any time) of an individual; or
 - (ii) an individual's expressed wishes about the future provision of health services to the individual; or
 - (iii) a health service provided, or to be provided, to an individual;that is also personal information;
- (b) other personal information collected to provide, or in providing, a health service to an individual;
- (c) other personal information collected in connection with the donation, or intended donation, by an individual of his or her body parts, organs or body substances;
- (d) genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

Sensitive Information has the meaning given to that term in the Privacy Act as updated or amended from time to time, which is accessible [here](#). At the time of publishing this Privacy Policy the Privacy Act defines Sensitive Information as a subset of Personal Information. It includes information or an opinion about a person's racial or ethnic origin; political opinions; membership of political or professional groups or trade associations or unions; religious or philosophical beliefs or affiliations; sexual orientation or practices; and criminal record. Sensitive Information also includes Health Information, genetic information, information to be used for biometric identification and biometric templates.

How do we collect and hold Personal Information?

When you visit our Website

If you visit our Website, our Website service provider may record certain information about your visit, which may include, but is not limited to,:

- IP address;
- geographic location
- domain name;
- internet service provider;
- the date and time of the visit;
- any information or documentation downloaded;
- the length of the session;
- the pages accessed;
- viewing and interaction activity, including but not limited to views, bounces, clicks, replies, forwards, opt outs and links;
- the website that referred you to our Website;
- your purchase history through our Website (if applicable);
- the type and version of the browser used by you; and
- the operating system used by you,

(“**Technical Information**”).

The Technical Information is aggregated for analysis as de-identified data.

We may use pixels, or transparent GIF files, in the Website to help manage online advertising and email marketing. These files enable our service providers to recognise a unique cookie in your web browser, which in turn enables us and our service providers to learn which advertisements and emails brought you to the Website, and how you use the Website.

If you visit any Technology other than our Website, it may be governed by its own privacy policy and you may be asked to agree to that privacy policy before using that Technology.

When you make a booking

If you book an appointment with us, we collect identifying Personal Information, including, but not limited to,:

- Name;
- Email address;
- Physical address;
- Phone number;
- Any specific issues you want addressed in your appointment with us;
- Gender;
- Date of Birth;
- Preferred language;

- Medicare Australia details;
- Payment details (where applicable);
- Private Health Insurance details (where applicable); and
- Workcover or other third party payer details; and
- your feedback and comments,

(“**Demographic Data**”)

Your Demographic Data may include Health Information and Sensitive Information. Your Demographic Data is kept in identifiable form but only disclosed in the limited circumstances detailed in this Privacy Policy.

When you visit our practice

When you visit our practice we may again collect the Demographic Data.

During examination and treatment, we will also collect further Personal Information, including Health Information and Sensitive Information, which may include but is not limited to:

- details of your general health;
- details of your eye health and symptoms experienced;
- recent health treatment and any future treatment you believe you may require;
- written details of findings by our staff found during your examination;
- details of supportive devices used by you (eg. eye glasses, contact lenses etc.);
- photographic, videographic, radiographic (eg. x-rays and other scans) of your eyes and other facial structures,

(“**Clinical Data**”).

External Health Practitioners

We collect a range of information from your general practitioner, other medical specialists and allied health practitioners to whom we refer our patients and from whom we receive referrals and advice, which may include but is not limited to:

- name;
- services offered;
- fees charged;
- practice name;
- practice address;
- phone number;
- email address;

- health profession and specialty/sub-specialty;
 - gender;
 - academic qualifications;
 - experience and specialisation summary; and
 - languages spoken,
- (“**External Health Practitioner Data**”).

How do we Use your Personal Information?

Technical Information

The Technical Information is aggregated for analysis as de-identified data.

We use the Technical Information to:

- continue to develop our Website; and
- direct our marketing strategy generally.

GIF files

Our use of GIF files includes, but is not limited to,:

- tracking responses to advertisements, emails and site content (including social media engagements);
- determining your ability to receive HTML based emails;
- recording how many users open an email;
- compiling aggregated statistics;
- better targeting interactive advertising;
- enhancing customer support and site usability; and
- providing offers and promotions that we believe would be of interest to you.

Demographic Data

We collect the Demographic Data for a range of purposes, including:

- to understand the reason for your appointment;
- to respond to enquiries from you;
- disclosure to your treating staff at the practice to prepare for providing services to you;
- disclosure to our administrative staff to maintain your patient file;
- disclosure to your general practitioner so they may coordinate your health care;

- disclosure to medical and allied health specialists outside our practice where we refer you for their services;
- to access funds to pay for your services; and
- to provide you with further information about our services;
- providing you with eye health awareness information, including by email;
- sending you newsletters, publications, communications and advertising material (including third party publications, communications and advertising material);
- compiling and analysing statistics and/or case studies (where you have consented to the latter);
- to optimise our services;
- administration, business planning, research and development and other internal management functions;
- debt collection;
- surveys and customer feedback;
- complying with our legal obligations;
- audit; and
- other purposes for which it was collected.

Clinical Data

Your Clinical Data is only ever used for the purpose it was collected, which may necessarily include disclosure to your treating staff at the practice, disclosure to our administrative staff to maintain your patient file, disclosure to your general practitioner so they may coordinate your health care, disclosure to specialists outside our practice where we refer you for their services and disclosure to your private health insurer to obtain funds for the services we provide to you.

Specific use of Clinical Data

You may be asked to consent to parts of your Clinical Data being used for professional development, education, research, for use in our Technology and for the commercial purposes of the practice and other organisations.

We will only ever use your Clinical Data for this purpose when you have first consented to this. Further, we will never disclose your Demographic Details along with the Clinical Data and, where the Clinical Data disclosed includes photographic, videographic or radiographic images, we will make all reasonable efforts to crop, blur, distort or otherwise deidentify any parts of the images which identify you as a person and which are not required for recognising eye health issues. Images in this form may be visible to others, including members of the general public.



External Health Practitioner Data

We collect the External Health Practitioner Data to refer our patients for health services not provided at the practice, where required.

Disclosure of Personal Information

In addition to the above uses, to the extent allowed by law we may disclose your Personal Information to:

- our Associates (as defined above);
- external organisations that are our agents, suppliers, service providers or contractors;
- our shareholders;
- third party IT suppliers where they are bound by confidentiality obligations;
- our professional advisers, such as accountants, lawyers, auditors and insurers where they are bound by confidentiality obligations; and
- if required by law, regulatory bodies, government agencies and authorities, law enforcement bodies and courts.

Direct marketing

You consent to us using your Personal Information to send direct marketing material to you in relation to our products or services, Associates' products or services, or the products or services of third parties.

If you do not wish to receive marketing information from us, you may at any time opt-out of receipt of further marketing communications by contacting our Privacy Officer (contact details below). If direct marketing is by email, you may also use the unsubscribe function.

You may contact our Privacy Officer if you do not wish us to disclose your Personal Information to third parties for direct marketing purposes.

Cookies and Other Technologies

Cookies and other technologies may be used by us or by third parties when you visit the Technology. In some cases, we may collect Personal Information from the cookies. 'Cookies' contain some information with a unique ID number pertaining to your computer or device. We may use this information to determine your use of the Technology and its performance.

We may also collect anonymous data (which is not Personal Information) about performance and errors that occur while you use the Technology.

The information collected from cookies and other technologies is used solely for our internal purposes in managing the Technology and improving its functionality and reliability, as well as to assist us to better target advertising, report statistics, analyse



trends, administer our services, diagnose any errors so that we can provide you with the best service.

Government related identifiers

In order to provide services to you and process payment for those services, we may collect and use government related identifiers, such as your driver's licence, Medicare number, health care card details and private health insurance details. However, we will not use or disclose any government related identifiers other than in accordance with the Acts, or as otherwise required or authorised by law.

Data integrity and security

We endeavour to ensure that all Personal Information we hold is accurate, complete and up-to-date. To assist us with this, you should contact us if any of your Personal Information changes, or if you believe that the Personal Information we have is not accurate or complete.

We take reasonable steps to protect the Personal Information that we hold from misuse, interference or loss.

If we no longer require Personal Information that we hold (including when we are no longer required by law to keep records relating to you), we will take such steps as are reasonable in the circumstances to destroy the information or ensure that it is de-identified.

Disclosure overseas

We may disclose your Personal Information overseas but this will only be done in the manner described under Disclosure of Personal Information above, and with your consent.

At the time of publication we currently house data on servers located in Australia whose operators are bound by the Privacy Act.

Access and correction

You can ask us for access to your Personal Information or for us to correct or update your Personal Information by sending a written request to our Privacy Officer at the address below. We do not impose any charges for requests for access, correction or updates but may charge a small fee for providing printed information.

Before correcting or providing access to Personal Information, we will require your identity to be confirmed. While the Privacy Act provides you the option of not identifying yourself or of using a pseudonym, we must confirm your identity before we provide you with access or the ability to correct your Personal Information in order to maintain its security and integrity.



Requests for access or correction may be refused upon the grounds contained in the Privacy Act. If we refuse to provide access, or to correct Personal Information, we will provide you with reasons for the refusal.

Links

The Technology and our email communications may contain links to third party sites. We do not control these sites or any of their content and if you visit these sites, they will be governed by their own terms of use (including privacy policies).

Complaints

Privacy related complaints should be directed to our Privacy Officer in writing at the email or postal address shown below. No charge will be imposed for making a complaint, or for dealing with the complaint. Once a complaint has been lodged, our Privacy Officer will acknowledge its receipt to you as soon as possible and we will endeavour to respond to your complaint as soon as possible.

We will do our best to ensure that our investigation is completed, and a decision on your complaint is communicated to you, within 30 days of our receipt of the written complaint. We will inform you if we need more time.

If we are not able to resolve your complaint to your satisfaction you may also contact the Australian Information Commissioner on the following details:

Office of the Australian Information Commissioner

GPO Box 5218

SYDNEY NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

You may also wish to contact Victoria's Health Complaints Commissioner on the following details:

Health Complaints Commissioner

Level 26, 570 Bourke Street

Melbourne VIC 3000

Telephone: 1300 582 113

Website: <https://hcc.vic.gov.au/>



Contact us

If you have any questions about this Privacy Policy or if you wish to request access to your Personal Information, correct or update your details or raise any privacy concerns, please contact us at:

Address: 1/10 Commercial Place, Drouin

Telephone: 03 9052 2887

Email: admin@gippslandeyecentre.com.au

Changes to this policy

We may amend this Privacy Policy, in whole or part, in our sole discretion at any time.

This Privacy Policy was last updated in June 2021 and is accurate at the time of publication.