

Privacy Policy

Privacy Policy

We are Eye Health Centre of Western Australia (**EHCWA, we, us or our**).

We are committed to protecting the information you provide to us and preserving your privacy rights.

1. What is this Privacy Policy about?

EHCWA is bound by the *Privacy Act 1988* (Cth) which incorporates the Australian Privacy Principles (**APPs**).

This Privacy Policy explains how your personal information (which includes your health information) is collected and used by us, and the circumstances in which we may share it with third parties.

Your personal information is information or an opinion that relates to you, whether true or not, which identifies you or from which your identity is reasonably identifiable.

2. How we collect your personal information

We normally collect personal information about you in these ways:

- (a) directly from you when you give us your details (eg. face-to-face, over the phone, via an online registration form); and
- (b) from a third party where we are permitted by law to do so. Often this is because it is not practical or reasonable to collect it from you directly. This may include information from:
 - your guardian or responsible person
 - other healthcare providers involved in your care, such as specialists and your GP
 - your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

We may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media.

3. Types of personal information we collect

The types of personal information we collect can include (but are not limited to):

- (a) At the time of making an appointment: your name and contact details.
- (b) At the time of consultation or when you fill you the online registration form: your name, address, date of birth, email address, contact details, spoken languages, information about other health professionals involved in your care, health information about you including your relevant medical and eye disease history, medications, allergies and family eye disease history.
- (c) Your name and email on interacting with us via our website or through social media.

4. Sensitive information

We will not use or disclose sensitive information that relates to you without your consent, except where collecting such information is required by law, or where you (or your representative) cannot give consent and the information is needed to provide a health service to you or to reduce a threat to the life or health of another person.

'Sensitive information' is defined as information about a person's health, their racial or ethnic origin, their political, religious or philosophical beliefs and affiliations, their membership in professional or trade

associations or unions, their sexual preferences or practices and their criminal record. It also includes genetic, genomic and biometric information.

5. Our purposes for handling your personal information

We primarily collect, hold and use your personal information to provide eye care services and eye wear goods to you and to communicate with you and others involved in your eye care in relation to those services.

We also use that information for other purposes, including to:

- (a) manage and administer those goods and services, including account keeping procedures;
- (b) communicate with you about, the goods and services you have sought and information you have requested from us;
- (d) comply with our legal and regulatory obligations;
- (e) otherwise to manage our business; and
- (f) any other purpose fairly and reasonably related to the purpose for which we have collected it.

We may use de-identified scans and eye images for teaching purposes, such as the training of optometry students and other optometrists. We may also use the information we have collected on you to contact you directly to invite you to participate in research.

The information is secure, patients cannot be identified, and the information is stored within Australia. We seek your consent in the online registration form. You may decide not to give us permission to use your information for teaching or research purposes or withdraw your permission at any time without penalty. Your response to this request will not influence the clinical care that you receive at EHCWA.

We may collect, hold and use personal information for other purposes but only if you have provided your consent.

6. When, why and with whom do we share your personal information?

We do not share, sell or otherwise disclose your personal information for purposes other than as outlined in this Privacy Policy.

We may disclose your personal information to third parties as permitted or required under law. If we disclose information to a third party, we require the third party to protect your information to the same extent that we do.

Specifically, we will disclose your personal information for the purposes outlined in this Privacy Policy to third parties in the following circumstances:

- (a) to provide (with your consent) your personal information to other health care providers (eg. referring doctor or specialist);
- (b) to provide your personal details to Medicare to the extent that is necessary for Medicare benefits to be claimed;
- (c) to provide you with eye care and eye wear goods and services; and
- (d) to perform authorised financial transactions with you.

We may also disclose your personal information to third parties:

- (a) to inform you about products or services we believe would benefit or be of interest to you, in circumstances where you might fairly and reasonably expect, and where you have not opted out from such receiving such information;

- (b) to conduct market research and market our products or services to you more generally (where you have consented to this);
- (c) to organisations who conduct marketing activities for us, subject to their obligations to protect privacy (where you have consented to this);
- (d) to assist with the delivery of goods or services (including physical delivery); and to third parties who act on our behalf (such as mail houses, health providers) when providing you with the goods and services with your consent and in accordance with this Policy;
- (e) to fulfil the purpose for which you have provided your personal information to us;
- (f) when it is necessary to prevent a serious and imminent threat to a person's life, health or safety or to public health or safety;
- (g) to investigate and resolve complaints concerning the provision of goods or services;
- (h) to allow you to participate in interactive features of our services, including on social media, when you choose to do so; and
- (i) to comply with our legal obligations.

We are unlikely to disclose your personal information to an overseas recipient unless you have provided consent. An example would be if we need to purchase a specialty optical appliance for you that is unavailable in Australia.

7. Data quality

We will take reasonable steps to ensure that the personal information we collect from you is accurate, complete and up-to-date. When you inform us of any inaccuracy, it will be corrected as soon as possible.

8. Protection of personal information

We will take all reasonable steps to ensure that the information we hold about you is protected from misuse, loss and unauthorised access, modification or disclosure. This includes:

- (a) all patient data is encrypted;
- (c) holding information in secure cloud storage;
- (d) getting staff to sign confidentiality documents;
- (e) providing staff with training or induction about confidentiality and, in particular, security issues;
- (f) access to information restricted on a 'need to know' basis; and
- (g) access is controlled through single sign-on with mandatory 2-factor authentication

We will also take reasonable steps to destroy information held about you once that information is no longer required, is not contained in a public record, or is no longer required to be maintained by us under an Australia law or court order.

9. Access to and correction of personal information

You may request access to, and ask us to make corrections to, the personal information that we hold about you. Instructions on how to lodge a request can be found at paragraph 14 of this Policy.

We will, on request, provide you with access to your personal information. When providing access, we will arrange a suitable time for you to view the information we hold, with an optometrist available to interpret the information, or explain any terms used. A fee may be charged for this service. A response to a question for access must be provided within a reasonable time.

In some circumstances, we may lawfully refuse to provide you with access where releasing the information would pose a serious threat to your health and wellbeing or that of another person; would unreasonably impact on the privacy of another person; would interfere in legal investigations or other proceedings, or would otherwise be illegal.

If we refuse to provide you with access to the information, we will provide reasons for the refusal and inform you of any exceptions relied upon.

The electronic record containing your personal information and the intellectual property contained in it remain the property of EHCWA at all times.

10. Identifiers

We will not adopt, use or disclose any identifier assigned to you by a government agency, except where required by law. Medicare numbers will only be used for the purposes of claiming Medicare benefits.

11. Dealing with us anonymously

It is your right to be dealt with anonymously, provided that it is lawful and practicable. We will try to accommodate this wherever possible. However, it may not be possible for us to provide optimal services without access to your personal information.

12. Trans-border data flows

We will not transfer data about you to a recipient in a foreign country unless you give your permission for us to do so, and the data will receive at least the same level of protection as in Australia.

13. Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time.

We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the EHCWA Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

You can block cookies on your specific machine but this may inhibit your ability to access the Website.

14. Requests, Complaints or Questions

If you wish to gain access to your personal information, please email EHCWA at info@ehcwa.com.au or call (08) 6488 7429.

If you have a complaint about a breach of your privacy or have any questions on how your personal information is collected or used, you can forward your complaint or question to the email address below: Associate Professor, Khyber Alam via khyber.alam@uwa.edu.au

We will respond to your request, complaint or question within a reasonable time.

You may also make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of your personal information as covered by the *Privacy Act*. Information on how to make a complaint to the OAIC can be found at www.oaic.gov.au or 1300 363 992.

15. Changes to this Privacy Policy



This Privacy Policy was last updated on 16/08/2024. We may alter or modify it without notice. We will endeavour to notify changes to the policy by a notice on our website.