



Privacy Policy

1 Policy statement

St Vincent's Clinic (SVC) is committed to protecting the privacy of the personal information and sensitive information which it collects and holds. This policy applies to SVC, which includes Open Support and the St Vincent's Clinic Research Foundation unless a specific alternate policy applies to those entities.

SVC must comply with the Australian Privacy Principles under the *Privacy Act 1988* (Cth), and other privacy laws which govern the way in which organisations (such as SVC) hold, use and disclose personal information (including your sensitive information).

The purpose of this Privacy Policy is to explain:

- (a) the kinds of information that SVC may collect about you and how that information is held;
- (b) how SVC collects and holds personal information;
- (c) the purposes for which SVC collects, holds, uses and discloses personal information;
- (d) how you can access the personal information SVC holds about you and seek to correct such information; and
- (e) the way in which you can complain about a breach of your privacy and how SVC will handle that complaint.

2 Definitions

In this Privacy Policy the following terms have the following meanings:

health information is:

- (a) personal information or an opinion about:
 - (i) an individual's physical or mental health or disability (at any time);
 - (ii) an individual's express wishes about the future provision of health services for themselves; or
 - (iii) a health service provided, or to be provided, to an individual;
- (b) other personal information collected to provide, or in providing, a health service;
- (c) other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or

- (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.

personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (e) whether the information or opinion is true or not; and
- (f) whether the information or opinion is recorded in a material form or not;

sensitive information means:

- (a) personal information or opinion about an individual's:
 - (i) racial or ethnic origins;
 - (ii) political opinions or political associations;
 - (iii) philosophical beliefs or religious beliefs or affiliations;
 - (iv) sexual preferences or practices; or
 - (v) criminal record; or
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information.

3 Collection and use of personal information

3.1 Types of personal information collected by SVC

SVC will only collect information which is necessary to facilitate the provision to you of services by SVC or to appropriately manage, conduct and oversee SVC's business. This may include (as applicable):

- (a) Patients/clients/research participants

SVC collects information from you to facilitate the provision of health care services to you by or to enable you to participate in research studies. This includes collecting personal information such as your name, address, telephone number, your health history, family history, past and current treatments lifestyle factors, and any other information which is necessary to assist the health care team in providing appropriate care, or our research team in conducting its research.

The individual doctors/allied health professionals at SVC collect and hold their patients' information. In some cases patients or their referring medical practitioners will provide information to SVC to facilitate their health care.

- (b) Accredited medical officers, students contractors and volunteers

SVC collects information from you which is necessary to properly conduct, manage and oversee SVC's business. This includes collecting personal information such as your name, address, professional experience, qualifications and past employers, and any other information which may be necessary to appropriately conduct, manage and oversee SVC's business.

- (c) Job applicants

SVC collects information from you which is necessary to assess and engage job applicants. This includes collecting personal information such as your name, address, telephone number, professional experience, qualifications, references

and past employers, and any other information which is necessary to process your job application.

(d) Donors

Where you have consented, SVC collects information from you for the purposes of fundraising for SVC including agreeing the terms of and managing any donations you agree to make. This includes collecting personal information such as your name, address and email address.

3.2 How we collect personal information

We will usually collect your personal information directly from you, however sometimes we may need to collect information about you from third parties, such as:

- (a) another health service provider;
- (b) past employers and referees; or
- (c) related entities (being those listed in the annexure).

We will only collect information from third parties where:

- (d) you have consented to such collection or your alternate health service provider has sent information to us;
- (e) such collection is necessary to enable us to facilitate the provision of appropriate care services by SVC;
- (f) such collection is reasonably necessary to enable us to appropriately manage, conduct and oversee SVC; or
- (g) it is legally permissible for us to do.

3.3 How SVC uses your personal information

SVC only uses your personal information for the purpose for which it was collected by SVC (**primary purpose**), unless:

- (a) there is another purpose (**secondary purpose**) and that secondary purpose is directly related to the primary purpose, and you would reasonably expect, or SVC has informed you, that your information will be used for that secondary purpose;
- (b) you have given your consent for your personal information to be used for a secondary purpose; or
- (c) SVC is required or authorised by law to use your personal information for a secondary purpose (including for research and quality improvements within SVC).

For example, SVC may use your personal information to:

- (d) facilitate the provision of health care services to you by a doctor or allied health professional based at SVC;
- (e) appropriately manage, conduct and oversee the SVHA Group's business, such as assessing insurance requirements, conducting audits, and undertaking accreditation processes;
- (f) assist SVC to manage, conduct and oversee SVC's business, including quality assurance programs, billing, improving its services, implementing appropriate security measures, conducting research and training personnel;
- (g) where required, effectively communicate with third parties; and

- (h) carry out fundraising activities (where you have consented).

3.4 Complete and accurate details

Where possible and practicable, you will have the option to deal with SVC on an anonymous basis or by using a pseudonym. However, if the personal information you provide us is incomplete or inaccurate, or you withhold personal information, we may not be able to provide the assistance or support you are seeking, or deal with you effectively.

4 Disclosing your personal information

4.1 Disclosures

SVC will confine its disclosure of your personal information to the primary purpose for which that information has been collected, or for a related secondary purpose. This includes when disclosure is necessary to help us manage, conduct and oversee SVC business, or for security reasons.

We may provide your personal information to:

- (a) government departments responsible for health, aged care and disability where SVC is required to do so;
- (b) third parties contracted to provide services to SVC, such as entities contracted to assist in accreditation or survey processes;
- (c) anyone authorised by you to receive your personal information (your consent may be express or implied);
- (d) fundraising institutions associated with SVC (where you have consented);
- (e) doctors and other healthcare professionals involved in your care;
- (f) anyone SVC is required by law to disclose your personal information to.

4.2 Third party service providers

Where we engage third party service providers, we may disclose personal information to those service providers who may use, process and/or store that information overseas.

5 Data storage, quality and security

5.1 Data quality

SVC will take reasonable steps to ensure that your personal information which is collected, used or disclosed is accurate, complete and up to date.

5.2 Storage

All your personal information held by SVC is stored securely in either hard copy or electronic form.

5.3 Data security

SVC strives to ensure the security, integrity and privacy of personal information, and will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. SVC reviews and updates (where necessary) its security measures in light of current technologies.

5.4 Online transfer of information

While SVC does all it can to protect the privacy of your personal information, no data transfer over the internet is 100% secure. When you share your personal information with SVC via an online process, it is at your own risk.

There are ways you can help maintain the privacy of your personal information, including:

- (a) always closing your browser when you have finished your user session;
- (b) always ensuring others cannot access your personal information and emails if you use a public computer; and
- (c) never disclosing your user name and password to third parties.

6 Use of cookies

A 'cookie' is a small data file placed on your machine or device which lets SVC identify and interact more effectively with your computer.

Cookies are industry standard and are used by most websites, including those operated by SVC. Cookies can facilitate a user's ongoing access to and use of a website. Cookies allow SVC to customise our website to the needs of our users. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. However, cookies may be necessary to provide you with some features of our on-line services via the SVC website.

7 Links to other sites

SVC may provide links to third party websites. These linked sites may not be under our control and SVC is not responsible for the content or privacy practices employed by those websites. Before disclosing your personal information on any other website, we recommend that you carefully read the terms and conditions of use and privacy statement of the relevant website.

2017 Amendments to privacy Act 1988

The passage of the *Commonwealth Privacy Amendment (Notifiable Data Breaches) Act 2017* established a Notifiable Data Breaches (NDB) scheme in Australia. The NDB scheme requires organisations covered by the Australian privacy Act 1988 to notify individuals likely to be at risk of serious harm by a data breach. In some cases of data breach the office of Australian Information Commissioner (OAIC) must also be notified.

8 Accessing and amending your personal information

You have a right to access your personal information which SVC holds about you. If you make a request to access your personal information, we will ask you to verify your identity and specify the information you require.

You can also request an amendment to any of your personal information if you consider that it contains inaccurate information.

You can contact SVC about any privacy issues as follows:

Chief Executive Officer
St Vincent's Clinic
438 Victoria Street
DARLINGHURST NSW 2010
T: (02) 8382 6222
F: (02) 8382 6402
E: clinic@svha.org.au

While SVC aims to meet all requests for access to personal information, in a small number of cases and where permitted to do so by law, SVC may not give access or may do so only under conditions.

Subject to applicable laws, SVC may destroy records containing personal information when the record is no longer required by SVC.

9 Complaints

If you have a complaint about SVC's information handling practices or consider we have breached your privacy, you can lodge a complaint with:

- (a) SVC's Chief Executive Officer using the contact details listed in clause 8 above;
or
- (b) the Office of the Australian Information Commissioner.

SVC deals with all complaints in a fair and efficient manner.

This policy was adopted on 12 August 2014 and last updated June 2023.