

## Practice privacy policy

### Your privacy is respected

This practice policy outlines how the practice uses and manages your health information. The Notice to Patients is posted in our patient waiting area as a summary statement of the policy.

The practice is bound by the Australian Privacy Principles contained in the Commonwealth *Privacy Act 1988* (Privacy Act) and the *Health Records Act 2001* (Vic).

The practice will review and update this Privacy Policy on a regular basis.

### Collection of Information

It is our usual practice to only collect health information directly from our patients or their authorised representatives.

In addition, personal information such as your name, address, contact details, health insurance and financial details are used for the purpose of addressing accounts to you, as well as for processing payments, collecting unpaid invoices via an external collection agency, and writing to you about our services and any issues affecting your health care.

We will only collect your email address if you send us a message or provide us with your address directly. Your email address will only be used for the purpose for which you have provided it, and it will not be added to a mailing list or used for any other purpose without your consent. We may however use your email address to contact you to obtain your consent for other purposes, but will give you the option of having your address deleted from our records at that time.

We collect personal information by lawful and fair means, wherever possible directly from you. This may occur through forms, emails, phone calls, in person, transactions, our website, surveillance cameras, or communication technologies. We may also collect information from publicly available sources or trusted database providers, and any such information will be handled in accordance with the Australian Privacy Principles (APPs).

When we collect your personal information, we will take reasonable steps to inform you of:

- who we are and how to contact us; if the information was obtained from another source;
- the purpose of collection and any consequences if it is not provided;
- who we may share it with, including any overseas recipients and their locations (if applicable); and
- how you can access, correct, or raise a complaint regarding your personal information.

The practice may collect health information from a third party or a publicly available source, but only if the patient consents to such collection or would reasonably expect us to collect their health

information from the third party, or if collection is necessary to provide the patient with appropriate health care.

### **Website statistics**

Our practice website, our web server collects the following type of information for statistical purposes:

- Your server address
- The pages you accessed and documents downloaded
- your ISP may collect more or less information for you
- Traffic Patterns

This is anonymous statistical data, and no attempt will be made to identify users or their browsing activities. This non-identified information is used to monitor usage patterns on our site to improve navigation and design features – helping you to get information more easily.

### **Cookies**

Our website only uses session cookies and only during a search query of the website. Our ISP has assured us that no cookies are employed on the website except for those associated with the search engine. The website statistics are generated from the web logs as outlined above.

Upon closing your browser, the session cookie set by the website is destroyed, and no personal information that might identify you should you visit our site at a later date is maintained.

Cookies can either be persistent or session based. Persistent cookies are stored on your computer, contain an expiry date, and may be used to track your browsing behaviour upon return to the issuing website. Session cookies are short lived, are used only during a browsing session, and expire when you quit your browser.

### **Employer/employee responsibilities**

As an employer, the practice collects personal information related to employment and human resource management.

All staff employed in this practice are required to undergo training to understand their responsibilities in maintaining your privacy and to sign a confidentiality agreement to protect your personal information.

### **Use and disclosure**

The practice only uses health information for the purposes of providing you with health care or for purposes directly related to providing you with health care. In addition, personal information is used to administer your invoicing for dental and/or medical services, credit card payments, process health

insurance claims or to collect unpaid invoices via an external collection agency. We will not use your health information for any other purpose unless one of the following applies:

1. You have consented
2. The other purpose is directly related to providing you with health services and you would reasonably expect that your information may be used for that purpose (for example, the practice may disclose your health information to another health service provider for the purpose of providing you with health care)
3. The use of your health information is required or authorised by law. This may include for the purposes of contact tracing, or any other purposes under directions from the state's Chief Health Officer during the COVID-19 pandemic.

### Data quality

The practice takes steps to ensure that the health information we collect is accurate, up to date and complete. These steps include maintaining and updating personal and health information when you attend the practice, or you advise us that your personal information has changed.

The practice keeps hard-copy and electronic records and takes reasonable steps to protect those records against loss, unauthorised access, use, modification or disclosure, or other misuse.

The practice ensures that hard-copy records are kept in locked files and there are security processes in place regarding computer access. The practice has taken steps to ensure that electronic data is backed-up.

After a period of seven years (and if you attended the practice as a child, you have reached the age of 25) we may destroy your records in accordance with applicable laws.

### Data security

When capturing customer data, it is passed through a secure Shibata Dental server using encryption technology to ensure that your information is protected when sent over the Internet. This also applies to information that may be collected for Shibata Dental by an agency, i.e. when entering a competition, where it will also be passed through a secure server.

### Access and correction

If an individual requests access to health or personal information we hold about them, or requests that we change that information, we will allow access or make the changes unless we consider that there is a sound reason under the Privacy Act, or other relevant law to withhold the information, or not make the changes.

Requests for access or correction must be in writing and directed to the practice Privacy Officer. If you have any questions, the Privacy Officer can be contacted during business hours at the practice.

The practice may charge for access to or copies of health records.

## Marketing

The practice's marketing functions support the growth and development of the practice and to provide you with information about services offered at the practice.

The practice may use your information for the purpose of direct marketing; however, we will not on-sell your personal information.

The practice understands that you may not wish to receive marketing materials from the practice. If you would prefer not to receive such information, a request can easily be made to the Privacy Officer or another staff member at the practice.

## Sending information overseas

As part of maintaining your records, the practice may use off-site electronic data storage providers, professional indemnity insurers, marketing agencies or other third-party service entities. These providers may be located offshore.

Where practicable, we will inform you about where your information is sent; however, at all times the practice will take reasonable steps to ensure compliance with the Australian Privacy Principles in relation to any off-shore transfer of your information.

## Non-disclosure of information

Although we respect your right to privacy, if you choose not to provide us with information relevant to your care, we may not be able to provide a service to you or the service we are asked to provide may not be appropriate for your needs.

Importantly, you could suffer some harm or other adverse outcome if you do not provide information relevant to your care.

## Complaints

We take your privacy seriously. If you suspect there has been or may have been a breach of your privacy, you can complain directly to the practice Privacy Officer.

In the event of a privacy breach, the practice will comply with applicable guides or guidelines issued by the Office of the Australian Information Commissioner for the handling of privacy breaches.

For more information about Privacy laws, or to raise concerns about any matter not satisfactorily resolved with the practice you can contact the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au) or ph: 1300 363 992).

Privacy and general complaints about your care can also be directed to the Health Complaints Commissioner, [hcc.vic.gov.au](http://hcc.vic.gov.au) or ph: 1300 582 113.

## Enquiries

For further information about the practice's management of privacy, please contact our Privacy Officer during business hours at 03 9889 0612 or email at [smile@shibatadental.com.au](mailto:smile@shibatadental.com.au).

This policy should be reviewed annually and any changes to policy and actions required to be documented and signed.

### Document details

Responsible person: Dr. Bhavini Patel

Review cycle: Annually

Date of last review: 12/07/2025

Action required:

Signed: 