

6.3 - Privacy Policy

Introduction

The purpose of this document is to outline how Horizon Doctors complies with its confidentiality and privacy obligations. Our priority is and always will be the health and wellbeing of your patients. We are committed to protecting the privacy of patient information and to handling your personal information in a responsible manner in accordance with the Privacy Act 1988, the Privacy Amendment (Enhancing Privacy Protection) Act 2012, the Australian Privacy Principles and relevant State and Territory privacy legislation (referred to as privacy legislation).

Why and when your consent is necessary

When you register as a patient of our practice, you provide consent for our GPs and practice staff to access and use your personal information so they can provide you with the best possible healthcare. Only staff who need to see your personal information will have access to it.

Why do we collect, use, hold and share your personal information?

Our practice will need to collect your personal information to provide healthcare services to you. Our main purpose for collecting, using, holding, and sharing your personal information is to manage your health. We also use it for directly related business activities, such as financial claims and payments, practice audits and accreditation, and business processes (eg staff training).

What personal information do we collect?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- healthcare identifiers
- health fund details
- next of Kin / Emergency contact

How do we collect your personal information?

Our practice may collect your personal information in several different ways:

1. Your first appointment completing the new patient form via Hotdoc or in person at our practice, staff will collect your personal and demographic information.
2. During the course of providing medical services, we may collect further personal information. Information can also be collected through electronic transfer of prescriptions (eTP), My Health Record, eg via Shared Health Summary, Event Summary.
3. We may also collect your personal information when you visit our website, send us an email or telephone us, to make an online appointment or communicate with us using social media.
4. In some circumstances personal information may also be collected from other sources. 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 involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services
 - your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

What is a patient health record?

A patient health record is a collection of all the medical and relevant personal information about an individual that is held by the practice. This record is the property of the practice; however patients may request a copy of their records. This may incur an administrative fee.

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

We sometimes share your personal information:

- with third parties who work with our practice for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with APPs and this policy
- with other healthcare providers
- when it is required or authorised by law (eg court subpoenas)
- when it is 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
- when there is a statutory requirement to share certain personal information (eg some diseases require mandatory notification)

- during the course of providing medical services, through eTP, My Health Record (eg via Shared Health Summary, Event Summary).

Only people who need to access your information will be able to do so. Other than in the course of providing medical services or as otherwise described in this policy, our practice will not share personal information with any third party without your consent.

We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

Our practice will not use your personal information for marketing any of our goods or services directly to you without your express consent. If you do consent, you may opt out of direct marketing at any time by notifying our practice in writing.

How do we store and protect your personal information?

We store all personal information securely. Your personal records are held in electronic format, in protected information systems, and hard copy format in a secure environment. All staff sign a confidentiality agreement and use passwords for entering systems, as security.

Document automation technologies that can access your personal information

We use automation technologies that can access your personal information, including:

1. Referral templates. When a doctor writes a referral for you to visit another medical specialist, some of your personal medical information is automatically extracted from your records and added to the referral documents. Different templates are used for different referral types and circumstances, extracting the specific medical information appropriate to the addressed specialist.
2. Automated reminders. Our medical software searches our database of medical records for important upcoming events (such as specific, important appointments) and sends automated SMS messages.
3. E-report delivery software. Blood analysis, medical imaging, medical practices and other medical institutions that a patient visits for tests or procedures will send us medical reports about the patients. These are automatically assigned to our doctors for review or manually flagged for administrative intervention if any personal details are incorrect or dubious (eg misspellings in patient names or birthdate).

Artificial Intelligence (AI) Scribe tool

The practice uses an AI scribe tool to support GPs take notes during their consultations with you. The AI scribe uses an audio recording of your consultation to generate a clinical note for your health record. The practice AI scribe service is Lyrebird Health.

What you need to know about Lyrebird Health:

- Transcription is performed exclusively within Australia
- Audio file is immediately destroyed post-transcription
- Transcription is redacted of sensitive, personal identifying information received
- The transcript is encrypted – it is not stored in its original form
- At the discretion of the practitioner, data may be stored temporarily in Lyrebird.

The practice will only use data from our digital scribe service to provide healthcare to you.

Electronic Communication Policy

Our practice is mindful that even if patients have provided electronic contact details, they may not be proficient in communicating via electronic means and patient consent needs to be obtained before engaging in electronic communication. Electronic communication includes email and facsimile. Communication with patients via electronic means is conducted with appropriate regard to privacy

CCTV

CCTV footage may be collected from our practice for security and safety purpose. Access by third parties will be tightly controlled to ensure confidentiality of individuals. Images will only be made to third parties in limited and prescribed circumstances, and this will generally be restricted to law enforcement agencies.

How can you access and correct your personal information at our practice?

You have the right to request access to, and correction of, your personal information.

Our practice acknowledges patients may request access to their medical records. We require you to put

this request in writing. Horizon Doctors will ask you to sign a consent form allowing us to transfer any medical records. Once the consent form is received by the practice, we will endeavor to copy your records within a month. We will advise the patient if there is a cost involved for transferring the information.

From time to time, we will ask you to verify that your personal information held by our practice is correct and current. You may also request that we correct or update your information, and you should make such requests in writing to practice manager reception@horizondoctors.com.au

How can you lodge a privacy-related complaint, and how will the complaint be handled at our practice?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing. We will then attempt to resolve it in accordance with our resolution procedure. You can email us at reception@horizondoctors.com.au. You must include your mailing address and contact number. Turnaround timeframe to your request will usually be 30 days. You may also contact the OAIC. Generally, the OAIC will require you to give them time to respond before they investigate.

For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992 or Office of the Health Ombudsman 13 36 46

Policy review statement

Horizon Doctors has the right to change the Privacy Policy at any time. If there are updates to Horizon Doctors Privacy policy, we will address the changes promptly and update the revision date of this document.

Document title: Privacy Policy Effective Date: 7/4/2025 Next review: 07/04/2026