

Camslen Pty Ltd Privacy and Confidentiality Policy

Introduction

This privacy policy is for Camslen Pty Ltd, which operates Mooroolbark Specialist Centre and Molescope Skin Cancer Clinic. It outlines how personal information is to be handled by staff, doctors and other contractors in the operation of Mooroolbark Specialist Centre and Molescope Skin Cancer Clinic.

There are two versions of this policy. This version, known as the “full policy” is the authoritative policy. There is a second version, which is a summary version that covers the basics of the policy for those just needing a general understanding of how Camslen Pty Ltd handles privacy. Should there be ambiguity between the two documents, the more comprehensive information in this full policy should take precedence over the summary. The summary will always contain a link or information on how to access the full policy.

Purpose

The purpose of this policy is two-fold. Firstly, it is to act as a policy document for staff, doctors and contractors (ie. people acting for or on behalf of Camslen Pty Ltd) as to how personal information is handled within Camslen Pty Ltd.

Secondly, it is to provide an understanding for those whose personal information is handled by Camslen Pty Ltd as to how that personal information is handled.

Types of Personal Information

Personal information handled by Camslen Pty Ltd mainly includes information in the following two categories:

- a) Information regarding patients, such as, but not limited to, contact details, demographic information and health information
- b) Information on staff, doctors and other contractors (which does not usually contain health information). Usually this category would be termed “individual/s”.

Where an individual falls into multiple categories (ie. they may be a staff member, but also a patient) there is a clear delineation between the information handled with regards to the two separate categories.

Personal information with regards to patients

Camslen Pty Ltd collects personal information from/about patients that is reasonably necessary to provide a health service to the patient. This also includes personal information collected with regards to administrative and internal business purposes related to providing that service.

This may include information collected from the patient via an information form, verbally by reception staff (in person or over the phone) and through consultation with doctors or other health professionals. This may also include information provided to Camslen Pty Ltd by third parties, such as a letter from a referring doctor.

On occasion, with the patient’s consent, personal information may be collected from a third party such as a relative or support person.

With a patient’s consent, personal information may be discussed with other health professionals, both associated with Camslen Pty Ltd (such as a nurse or doctor working at the centre) and separate (such as discussing the case with a doctor from a hospital or another clinic). Where personal information about patients is discussed in this context, only personal information relevant to the clinical case is discussed.

Where personal information includes clinical images or photos, these are securely stored and used as outlined elsewhere in this policy.

Personal information with regards to other individuals

Camslen Pty Ltd, in the course of operating Mooroolbark Specialist Centre and Molescope Skin Cancer Clinic, may collect personal information from other individuals. This may be in relation to a patient, such as personal information collected from or about a relative or next-of-kin.

It may also include personal information collected from and/or about staff/employees, doctors, contractors and other individuals with regards to their part in the operations of Camslen Pty Ltd.

Personal information collected from other individuals may include sensitive information such as criminal record or working with children checks or health information.

Personal information is usually collected directly from the individual, but also may be provided by a third party, such as an employer or referee. Sensitive information will not be collected without consent of the individual, unless authorised or required by law.

Scope of Policy

This policy applies to Camslen Pty Ltd's handling of personal information, regardless of how that personal information was collected. This includes the collection, use and disclosure of personal information from patients, visitors, next-of-kin, referring doctors, other health service providers, contractors, suppliers, trade representatives, and any other individuals associated with the operations of Camslen Pty Ltd.

Definitions

For the purpose of this policy:

Personal Information/Health Information

The Privacy Act 1988 (Cth) defines "Personal Information" as information or an opinion about an identified individual, or an individual who is reasonably identifiable:

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

The meaning of "Health Information" as outlined in the Privacy Act 1988 (Cth) (6FA) is information or an opinion about the health, including an illness, disability or injury, (at any time) of an individual; or an individual's expressed wishes about the future provision of health services to the individual; or a health service provided, or to be provided, to an individual that is also personal information. This includes other personal information collected to provide, or in providing, a health service to an individual, or 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 or 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. The terms "Health Information" and "Medical Record" may be used throughout this policy. A patient's medical record is part of their Health Information, but Health Information encompasses more than just the patient's medical record.

Individual/Patient

This policy covers how personal information about individuals is handled, regardless of whether they are a patient or another individual. These words may be used interchangeably throughout the policy. Where the word "patient" is used, it is often because the handling of that specific type of information only happens with regards to patients. However, the same responsibility in the handling of that information would apply if they were not, or were no longer, a patient.

Handles/Handling

The term "handles" or "handling" relates to how personal information is collected, used, stored, disclosed or destroyed. Depending on the context, it may refer to one or all of these elements. For example, how patient information is handled in the context of booking an appointment includes how it is collected, used and stored.

Uses of "Camslen Pty Ltd", "Mooroolbark Specialist Centre", "Molescope Skin Cancer Clinic" or "we" are defined as all those who are covered within the scope of this policy, such as, but not limited to, staff and doctors.

Applicable Legislation

This policy has been developed with regards to the following legislation and frameworks:

1. Australian Privacy Act 1988 (Cth)
2. Australian Privacy Principles (APPs) as outlined in the Privacy Act 1988 (Cth)
3. Privacy and Other Legislation Amendment Act 2024

Australian Privacy Principles (APPs)

Camslen Pty Ltd operates Mooroolbark Specialists Centre and Molescope Skin Cancer Clinic. As a private sector health service provider, Camslen Pty Ltd is required to comply with the APPs under the Privacy Act 1988 (Cth).

The APPs regulate how Camslen Pty Ltd may collect, use, disclose, store and destroy personal information and how individuals may access and correct personal information which Camslen Pty Ltd holds about them.

The 13 Australian Privacy Principles as outlined in the Privacy Act 1988 (Cth) are as follows:

1. Open and transparent management of personal information
2. Anonymity and pseudonymity
3. Collection of solicited personal information
4. Dealing with unsolicited personal information
5. Notification of the collection of personal information
6. Use or disclosure of personal information
7. Direct marketing
8. Cross-border disclosure of personal information
9. Adoption, use or disclosure of government related identifiers
10. Quality of personal information
11. Security of personal information
12. Access to personal information
13. Correction of personal information

The following sections outline how Camslen Pty Ltd handle Personal Information in line with the Australian Privacy Principles.

Openness and transparency with regards to handling of personal information (APP1)

Camslen Pty Ltd is committed to being open and transparent with regards to the handling of personal information. Steps we take to ensure this are as follows:

- a) An up-to-date and regularly reviewed privacy policy (this document) is available to all staff, doctors and other contractors that outlines the expectations around how personal information is handled
- b) Information regarding the policy is easily and freely accessible, including but not limited to being available on the website and/or in hardcopy form
- c) A layered approach is taken to conveying information about the handling of personal information. For example, having a summary version of this full policy available on the website that covers the most commonly needed details, with links to the full policy for those who need more details or less commonly needed details
- d) Staff are trained and knowledgeable to answer general questions regarding the handling of personal information (ie. simple/common questions should not require individuals to read through the full policy in order to find the answers themselves)
- e) Details about digital storage of personal information, where those details do not pose a security risk to that storage, is available upon request. For example, a patient enquiring about whether data is stored within Australia or which medical software is used, is a reasonable request. Whereas wanting to know the IP Address of the specific server is not reasonable, as this could pose a security risk
- f) Policies and procedures with regards to notifying individuals of breaches of privacy (whether accidental, intentional or malicious) are clearly outlined and available (as discussed elsewhere in this policy)
- g) Systems are in place with regards to recording and addressing near-miss incidents (ie. where a breach has not occurred, but where things happened that could have resulted in a breach). For example, an area designated for secure storage accidentally being left unlocked

Anonymity and pseudonymity (APP2)

For the majority scenarios where personal information is handled by Camslen Pty Ltd, it is impracticable for this to be done anonymously or via a pseudonym. For example, a patient's Medicare card will list their legal name. Similarly, in the process of employing a staff member, reference checks and/or police checks etc. may be required to take place.

However, there are ways in which anonymity or pseudonymity are relevant as follows:

- a) Avenues for feedback (solicited or unsolicited) contain options for this to be given anonymously
- b) Avenues for enquiring about services provided are present, without requiring an individual to identify themselves
- c) Where requested, staff may use a pseudonym publicly (ie. when communicating with patients), even where their legal name may be known by Camslen Pty Ltd. For example, in cases of domestic violence, to reduce the risk of an ex-partner finding out where they work
- d) Where a complaint is made with the request of anonymity, but the identity of the person is known, care is taken to ensure anonymity is maintained (ie. separating or redacting their personal information from the complaint)
- e) Where information is disclosed to third parties and the personal information component is not required, the information is de-identified prior to release

Collection of solicited personal information (APP3)

Camslen Pty Ltd collects personal information in order to provide health services to patients. This includes collecting information from:

- a) Patients directly via patient information and consent forms
- b) Patients directly through verbal communication (ie. consultation with a doctor)
- c) Patients indirectly through communication received from other medical professionals or health services, test results etc.
- d) Staff with regards to employment (including background checks etc. to determine suitability for employment)
- e) Doctors and other contractors (including background and/or accreditation/qualification checks where applicable)
- f) Staff, doctors and other contractors with regards to their function (ie. contact details, insurance information etc.)

With regards to patients, information collected may contain sensitive information and health information, including, but not limited to, their medical record.

Information collected from patients on the patient information forms will differ depending on which specific health care is being provided. For example, information collected for a patient attending a skin check at Molescope Skin Cancer Clinic will differ from information collected from a patient seeing an endocrinologist at Mooroolbark Specialist Centre. In general, information collected from patients falls into the following categories:

- a) Demographic and contact information (such as name, address, phone number etc.)
- b) Healthcare details (such as Medicare number, private health fund details, regular GP contacts etc.)
- c) Medical history including:
 - a) Reason for the appointment
 - b) Information about relevant medical history and conditions
 - c) Information about current or previous medications that are being taken
 - d) Information about any allergies
 - e) Information about relevant lifestyle factors
- f) Information about other factors that may be relevant to their consultation (ie. the patient requires disabled access or the patient doesn't speak English)

All information that is collected is done so in accordance with legislation and regulations with regards to providing a health service.

Dealing with unsolicited personal information (APP4)

There are scenarios where unsolicited personal information is provided to Camslen Pty Ltd. This may occur in the following ways:

- a) A patient or other individual discloses information about themselves without that information being solicited
- b) A patient or other individual discloses information about a third party without that information being solicited
- c) A third party discloses information about a patient or individual that was different to the requested information. For example, if another health provider sends the wrong patient information by mistake
- d) A third party discloses information about a patient or individual that was additional to the requested information. For example, a full medical report is sent when only certain information was required

In a scenario where a patient or other individual discloses information that was not solicited, but that falls into the category of information that is normally solicited, that information should be treated in the same manner as solicited information.

In a scenario where a patient or other individual discloses information that was not solicited and does not fall into the category of information that is normally solicited, this information should not be stored (if disclosed verbally) or should be destroyed (if provided in writing)

In a scenario where a patient or other individual discloses information about a third party, it must be treated differently to information provided directly from that third party. For example, if a patient discloses personal information about another person during a consult, it may be appropriate/necessary for that information to be included in the consultation notes as it relates to providing health care to the patient. But it would not be appropriate for that information to be used/stored outside of that context.

In a scenario where a third party discloses information about a patient or individual that was different to the required information, such as sending information about the wrong patient. The third party should be notified that they have sent incorrect information and that information should be returned or destroyed.

In a scenario where a third party has disclosed additional unsolicited information to that which was solicited, only the required information should be kept on file. In scenarios where it is impracticable to separate the unsolicited information from the solicited information (such as letter stored on file that includes both solicited and unsolicited content) this document may be stored. However, any personal information that would not fall within the category of solicited information should not be used beyond the context of being contained in the original document. In some circumstances it may be possible for that information to be redacted or for a replacement document without the unsolicited content to be requested.

Note: There may be certain circumstances when unsolicited personal information needs to be retained and/or disclosed, such as in the case of a complaint/allegation against another person or disclosure of unlawful or unethical behaviour. Other policies cover the correct procedures for making reports to regulatory boards and/or law enforcement

Notification of the collection of personal information (APP5)

Camslen Pty Ltd is committed to transparency with regards to the collection of personal information, including notifying patients/individuals in advance with regards to when information is being collected, why it is being collected and how it will be used.

The main method of collecting information personal information relevant to Camslen Pty Ltd are:

- a) New Patient Information Forms
- b) Verbal Conversations (phone or face-to-face) with receptionist to confirm details

c) Consultations with doctors or other health professionals

In the case of personal information that is solicited/collected through patient information forms:

- Only information that is permissible to be collected by law and relevant to the purpose for collection is solicited on the forms
- The reason why information is being collected should be explained if it is not reasonably expected that it is self-evident. For example, collecting contact details would be considered self-evident without need for explanation. However, collecting details on lifestyle/hobbies may need further explanation as to why they are being collected. This may be through an explanatory note, or through a section heading
- It should be clear on the form if there are any questions that are optional and/or listed as "if applicable". This is especially relevant where the information provided is dependant on the reason for the appointment
- Patients are made aware of the privacy policy and have the chance to have any questions answered with regards to privacy and confidentiality prior to completing the form

In the case of personal information that is solicited/collected verbally:

- The reason for the collection of the personal information should be given as part of the question; or
- The reason should be explained if the patient/individual asks for an explanation

Patients/Individuals should always know that they have the right to opt out of providing personal information. However, the consequences of doing so should also be clear. For example, a patient has the right to not provide certain details, but the consequence of that may be that we are not able to provide a health service to them.

Use or disclosure of personal information (APP6)

The following outlines how Camslen Pty Ltd uses and/or discloses personal information.

Whenever personal information is collected by Camslen Pty Ltd, the primary purpose for the collection of that personal information will be made clear. In the context of collecting personal information from patients, the primary purpose is to facilitate providing a health service.

This use and disclosure of this personal information includes, but is not limited to:

- Entering patient information into the medical management software
- Sending required information to third parties as part of medical care, such as requesting tests or following up test results
- Using contact information to book or follow up from appointments or to follow up payment
- Communicating with other health professionals with regards to the patient as required (ie. letters/referrals)

Some specific examples of the use and/or disclosure of personal information with regards to patients, which may fall into both the primary purpose and/or a secondary purpose are as follows:

a) Use within the broader health care system to provide treatment

The provision of health care for a patient often includes multiple health care professionals; from GPs to specialists to allied health professionals. In order to provide effective multi-disciplinary health care, Camslen Pty Ltd may disclose a patient's personal information to other health service providers. Some examples of this would be coordinating diagnostic tests such as pathology or radiology. This may also include discussion of specific clinical cases with other doctors, either in person or remotely (phone/video).

b) New/potential patients

In certain scenarios, personal information may be collected, either directly from an individual, or through a referral, about an individual who is not yet a patient. This information may be used to assess whether Camslen Pty Ltd is able to provide the relevant health care. Where, for whatever reason, no health care is provided (ie. no appointment is made or the appointment is cancelled) Camslen Pty Ltd may keep the personal information on file, until such time as deemed no appointment will be booked, at which time the personal

information will be removed from the database. Note: This is only with regards to personal information on individuals who do not become patients. Any personal information that falls into the category of medical records will be kept for the required period of time before being destroyed.

c) The patient's local GP

Where a patient has been referred for treatment by their local GP, personal information may be shared with that GP with regards to providing ongoing complementary care. This may be provided to the GP in written and/or verbal form. At times, GPs may contact us directly to discuss or clarify relevant care information. Consent for sharing information with a patient's nominated GP will be assumed unless the patient informs us that they do not wish for this to be the case.

It is the patient's responsibility to notify Camslen Pty Ltd if they wish to change their nominated GP, to ensure we are communicating with the correct GP and/or clinic.

d) Relatives, guardians, friends or legal representatives as nominated by the patient

Where relevant, Camslen Pty Ltd may disclose/discuss personal information for a patient with a spouse, partner, parent, guardian, child, carer, other relative or nominated legal representative. Where consent has been given by a patient for their personal information to be discussed with another, this consent will be considered as current unless we are notified by the patient that they are removing consent. For example, where a spouse has been given consent to be involved in the health care of a patient in the context of being responsible for confirming details around their care, this consent will remain current unless removed.

Where applicable, a person acting under the authority given them as an enduring power of attorney will have access to personal information about a patient, even where prior consent has not been given directly to Camslen Pty Ltd

e) Pharmacies and other similar service providers

Camslen Pty Ltd will disclose a patient's personal information to pharmacies and other similar service providers (for example, insulin pump provider) in order to facilitate the patient receiving the medication and/or equipment as required for their care. A patient's personal information will only be disclosed to the extent required for providing the medication and/or equipment.

Where requested by a patient, prescriptions may be sent directly to a retail pharmacy in order for the medications to be collected by the patient and/or their representative.

Camslen Pty Ltd also may issue prescriptions through electronic scripts, which are sent directly to the patient's phone as a link, rather than a printed prescription. In these cases, Camslen Pty Ltd will disclose personal information electronically as required for this service.

f) Hospitals and/or emergency services

Where a patient has been admitted to hospital, either in an emergency situation or as part of a planned procedure, Camslen Pty Ltd may disclose a patient's personal information to the treating doctors. Personal information will only be disclosed to the extent required for treatment and as required by law.

g) MyHealth Record

Where patients have opted to participate in the MyHealth Record program operated by the Commonwealth Government, Camslen Pty Ltd may upload personal information for a patient electronically to the MyHealth Record system. Patients always have the option to include or not include information in MyHealth Record.

h) Clinical trials

Camslen Pty Ltd may use a patient's personal information in order to assess whether they qualify for certain clinical trials and to make patients aware of these trials. A patient's personal information will not be disclosed to clinical trials without the consent of the patient. A patient's de-personalised information, however, may be shared with a clinical trial researcher to determine whether or not they qualify for the trial.

i) Training of doctors or other health professionals

On occasion there will be trainee doctors or other health professionals who may be observing consultations as part of their education program. In these cases, patients will always be informed prior to the consultation and given the option to not have the person in training present in their consult. Where a trainee is present in a consultation, they are bound by the same privacy and confidentiality considerations as the treating doctor.

These are the most common examples of how Camslen Pty Ltd uses and discloses patient information, however, it is not an exhaustive list.

Some examples of non-patient specific collection, use, or disclosure of personal information include:

a) Contact and/or access details

Camslen Pty Ltd may collect personal details with regards to contacting individuals and/or accessing certain services. For example, giving staff, doctors or visitors access to wifi networks. Camslen Pty Ltd may also collect personal information to confirm the identity of a person acting on behalf of a patient. Individuals have the right to not disclose their personal information, however, that may impact their ability to access a service.

b) CCTV and surveillance systems

As part of the function of providing security to facilities, property and people, Camslen Pty Ltd sites include both external and internal camera systems. These cameras are an “always-on” measure to provide continuous surveillance of the properties. These cameras may incidentally record personal information in addition to video footage of people attending the facilities. Recorded footage may be stored for a certain amount of time after collection, before being overwritten. Footage may be viewed in real-time by reception staff and may also be accessed remotely through a secure connection.

Footage recorded via the security cameras may be released to law enforcement, including where relevant, identifying people in the footage to law enforcement. This may also include footage that may be captured outside the boundary of the property, such as down the driveway. Footage may also be released to insurance companies with regards to theft or damage of property.

Footage is not released to third parties or used for purposes other than listed above, unless required by law. Individuals may request footage in certain circumstances, such as where incident or injury has occurred to an individual or their property (such as a car accident in the car park). Under certain circumstances, and where permissible by law, this footage may be provided upon the appropriate request being received from an individual or their legal representative.

Signage is present alerting people to the presence of these cameras.

c) Tasks outsourced to contractors

Personal information collected by Camslen Pty Ltd may be disclosed to contractors under an agreement to provide a service for or on behalf of Camslen Pty Ltd. For example, an IT contractor being given contact details of employees to provide technical support. Any contractors working for or on behalf of Camslen Pty Ltd are bound to operate within the privacy policy with respect to any personal information disclosed to them from Camslen Pty Ltd.

d) Job applicants

Where applications for employment are received, whether solicited or unsolicited, personal information may be collected for the primary purpose of an employment selection process. In order to ascertain suitability for employment, Camslen Pty Ltd will conduct processes as required and/or allowed by law. This may include checking listed credentials with a governing body, verbal and/or written reference checks, criminal records and/or working with children checks.

For successful applicants, collected information, along with any additional information requested and provided will be used to set up the individual as an employee. For unsuccessful applicants, or where unsolicited applications/resumes are received, these may be kept on file for future job opportunities. Individuals are able to request their resume not be kept on file.

e) Students or trainees

Camslen Pty Ltd may at times engage medical students or other trainees. Where students or trainees are involved with Camslen Pty Ltd, they are required to adhere to this privacy policy. In addition, Camslen Pty Ltd will collect personal information on trainees in order to facilitate their placement. This includes personal information disclosed to their assigned supervisor to oversee the placement. Information will also be disclosed to third parties such as insurance and bookkeeping, as well as to any required professional or educational bodies involved in the traineeship.

Unless instructed otherwise, personal information stored on trainees may be retained with regards to contact regarding future employment opportunities.

Occasionally there will be opportunities for individuals to opt-in to the use of some of their personal information for a secondary purpose. For example, having their de-identified personal information used for educational or marketing purposes.

In scenarios where information collected is to be used for a secondary purpose:

- It is made clear where permission is being asked for a secondary purpose
- It is made clear that opting in or out of use of their information for this secondary purpose does not impact the use of the information for the primary purpose; or
- In scenarios where use for the secondary purpose may have implications for use for the primary purpose, this is explained in order for the individual to make an informed decision
- Individuals are made aware of this prior to the collection of their personal information ; or
- Where the personal information has already been collected, individuals are given the opportunity to opt-out of their personal information being used for that purpose before it is used in this way
- On some occasions, personal information will be re-collected, even if that information is already stored, in order to avoid ambiguity about the purpose for collection

In addition to these secondary purposes, there may be occasions where personal information is disclosed as required by law or with regards to emergency situations.

Direct marketing (APP7)

For the purpose of this section, 'direct marketing' refers to the use of personal information including, but not limited to, contact information, for marketing of the services provided.

This personal information may include:

- a) Personal information collected by Camslen Pty Ltd directly from the individual
- b) Personal information collected by Camslen Pty Ltd from other sources

With regards to personal information collected directly from the individual, Camslen Pty Ltd will only use personal information stored for direct marketing purposes where permission has been given by the individual to do so.

There are some exceptions to this, where it is deemed the individual would reasonably expect their personal information to be used in this way. For example:

- Sending out a reminder about an upcoming appointment
- Contacting a patient to alter their appointment date/time
- Contacting a patient with regards to requests from a doctor prior to their appointment (ie. Making sure they have certain test results prior to the appointment)
- Sending out a reminder about booking their next appointment (ie. where a patient is overdue for booking their appointment)
- Sending out important information about something relevant to a patient. For example, important information on technology or medication relevant to them that might be time-sensitive between appointments

- Sending out information about significant changes to the organisation (such as a change of location, contact details or bank details etc.)

For these, and other scenarios where it is deemed the individual would reasonably expect their personal information to be used in this way, and in the absence of an individual opting out of such communications, Camslen Pty Ltd may communicate without an expressed opt-in to these communications.

In scenarios where individuals have given permission (ie. opted-in) for direct marketing contact:

- Marketing will only be with respect to the permission given (ie. not using the details to market on behalf of a third-party)
- Where external advertising or sponsorship (paid or otherwise) is included in any direct marketing, personal information will not be released to that third party
- Personal information will never be sold or given away in part or whole
- Opportunities to opt-out of future direct marketing are clearly available (ie. SMS 'STOP' or unsubscribe links in e-mails etc.)

There are a variety of scenarios where personal information may be collected about an individual from a third party (ie. other sources). For example, in the course of providing health services, Camslen Pty Ltd will collect contact information on other health services and this may contain personal information about individual health professionals. Personal information collected in this manner will not be used for direct marketing purposes, unless that individual opts-in to receiving direct marketing communication from Camslen Pty Ltd.

Cross-border disclosure of personal information (APP8)

In general, Camslen Pty Ltd does not disclose personal information to overseas recipients.

Adoption, use or disclosure of government related identifiers (APP9)

Within the function of providing a health service, Camslen Pty Ltd may use a patient's Medicare number as one element of confirming their identity. This is in conjunction with their name and date of birth. Whereas multiple patients may have the same name and/or date of birth, the Medicare number is a unique identifier.

Scenarios under which a patient's Medicare number may be used or disclosed include:

- Ensuring that personal information is being stored with regards to the correct patient
- Matching test results with the correct patient
- Ensuring billing and Medicare claims are made with respect to the correct patient
- Disclosure on documents such as pathology slips, prescriptions, referrals etc. to confirm the identity of the patient for other health service providers

Disclosure of Medicare numbers is limited to these uses within the function of providing health care.

Quality of personal information (APP10)

Camslen Pty Ltd has systems in place with regards to the quality of personal information that it holds with regards to it being both accurate and current.

The first step in this process is the collection of the information. The majority of this is collected electronically, which removes an element of human error. Where information is collected on paper forms, this is entered into the system while the patient is present (ie. in the waiting room prior to an appointment). If required, reception staff can clarify any information with the patient at the time.

Where information is provided verbally (either in person or over the phone), reception staff will either repeat the information back to the patient or ask them to repeat the information to confirm they have taken the details down correctly (i.e. such as updating a phone number).

With regards to ensuring information is kept up-to-date, patients are routinely asked to confirm details that may change (ie. phone, address) when booking or at appointments.

In a scenario where information may have changed and this is incidentally disclosed to a doctor during a consultation (ie. a patient talking about their new phone and how they had to change their number) the doctor will either change that information in the system, or ask reception to update it when they talk to the patient.

Where there has been a lengthy period between appointments, patients may be asked to complete a new patient information form.

Where information from a third party differs from the information we have on file, the patient is contacted to confirm the correct information.

Security of personal information (APP11)

Camslen Pty Ltd takes seriously the responsibility of ensuring that any personal information is collected and/or stored securely.

Personal information may be both collected and stored digitally or as a hardcopy. For example, the new patient information form can be completed either via a digital form, or on a paper form. Similarly, personal information will be stored in digital form in a database, but may also be included on hardcopies, such as referral letters.

With regards to information collected/stored digitally:

- Any digital collection of information is done via secure/encrypted forms
- Information stored in the medical database software is only accessible by authorised users
- Information is only stored on secure servers and not on personal devices
- Processes are in place to ensure timely removal of staff/doctors from IT systems upon finishing
- Any hardware used for the storage of personal information (ie. hard drives) are securely erased and destroyed upon decommissioning

With regards to information collected/stored in hardcopy format:

- Information received in hardcopy format is shredded after use or transfer to digital format
- In scenarios where hardcopy documents are required to be kept, they are stored in secure/locked areas
- Destruction of personal information stored in hardcopy format is shredded. Currently by a professional on-site contracted service

Initial and ongoing training is provided to staff with regards to the security of personal information.

Access to personal information (APP12)

Following are the processes with regards to a patient/individual requesting a copy of the personal information stored on them. This includes information which they have provided, but also may include information collected from third parties, such as other health service providers.

Patients may be requesting their information to be directly released to them, or they may be requesting the information is transferred to another health service provider (ie. a patient is moving house and wants their medical record sent to the new health service provider in their new location).

There are also scenarios where a third party, such as a lawyer or insurance company, requests information on behalf of a patient.

Information stored on patients is located within the medical management software. When a patient requests their information, it is a matter of exporting the information from this database.

When a patient requests their own information, the preferred method is for this to be collected in person on removable storage. However, upon the patient's direction, this can instead be e-mailed. In a scenario where a

patient is not collecting the information in person, standard precautions are taken to ensure the information is being released to the correct person. Staff are trained to look out for “red flags” such as somebody requesting the information to be sent to a different e-mail address than the one on file etc.

With regards to a request from another health service provider to transfer records across, this is made on official letterhead, detailing the patient’s name, address and date of birth. The vast majority of the time this is initiated by the patient prior to us receiving the request. In any scenario where there is doubt, the request is checked with the patient prior to responding to the request.

With regards to requests from lawyers or insurance companies, these are accompanied by forms signed by the patient requesting the information.

There are certain scenarios where it would be unlawful to provide access to personal information stored on an individual, or where providing access to that information may pose a serious threat to the life, health or safety of another individual. In any scenario where there were concerns about the ability to provide access, legal advice would be sought prior to releasing the information.

Correction of personal information (APP13)

As per APP 10, Camslen Pty Ltd is committed to ensuring the quality of personal information stored. Part of this is ensuring that the information stored is correct. There are two main scenarios where personal information that is stored needs to be corrected.

- a) Upon direct request from the individual with the correct information
- b) It is discovered through an inconsistency between stored information
- c) It is notified by a third party, either intentionally or otherwise (ie. A referral letter is sent for a patient with a different address than what we have on file)

A third, sub-section of point (c) above would be where a reasonable belief is established that information supplied by an individual is intentionally inaccurate.

Where a request is made from an individual to correct information stored on them, this can usually be implemented at the time the notification is made.

Where an inconsistency within internal or external sources of information is discovered, the usual process would be to contact the patient to confirm the correct details.

Personal information and websites

Camslen Pty Ltd may operate various websites, including but not limited to, mbspecialists.com.au and molescope.com.au. Camslen Pty Ltd may also have a presence on third party websites such as social media platforms. The following section outlines how personal information may be collected and used with regards to these websites.

- a) Personal information provided directly by the user

There are various scenarios where a user will provide personal information on a website. For example, providing details through the online booking portal or patient information forms. Similarly there may be opportunities to sign up for a mailing list or to receive specific information. For these scenarios, collection of this information will be subject to the specifically outlined purposes and consent.

- b) Additional information that may be collected

Where users do not provide personal information, Camslen Pty Ltd do not attempt to collect personal information based on technical information received. However, we may use tools such as analytics for statistical purposes and may also use technical information with regards to security and/or fraud prevention. For example, our systems may flag communication through the website as fraudulent if it is claiming to come from Australia, but is originating from overseas.

When users visit our websites, information collected may include details such as:

- Type of device (ie. computer or phone)
- The version of web browser being used and OS (ie. Windows/Mac)
- The IP Address of the device
- The date and time of the visit
- The geographical location as reported by the ISP or VPN connection
- The pages viewed during a session
- A log of any documents downloaded

The accuracy of the information collected may depend on the security/privacy settings of the user. Some of the information may not be collected at all, and other information may be collected in isolation. For example, a log of downloads may be kept, but this may not necessarily link to a specific user.

Technical information collected from visitors to the website may be used by our web developers to evaluate the effectiveness and make improvements to the websites.

Website logs may be made available, where applicable and allowed/required by law, to law enforcement agencies. For example, when investigating an attempted cyber attack.

c) Analytical information as provided by third parties such as social media platforms

Where a user engages with us on social media platforms, these platforms may collect and make available to us certain personal information. This may include information such as an individual's name and location. It may also include demographic information. The information that various social media platforms collect and disclose with regards to users of the platform are subject to the privacy settings of the individual user.

Additionally to the information that may be disclosed by a social media platform, there may be information that is not disclosed to us, but which is available to us in terms of targeted marketing. For example, a social media platform may allow advertising targeted towards a specific demographic such as location. The user's location is not disclosed to us directly, but the targeted advertisements purchased from that platform are shown to users who meet those demographic requirements.

d) Cookies

Our websites may store "cookies" in the cache of a user's web browser in order to facilitate users returning to the website in the future. An example of cookie use may be to show an introductory page to a first-time user, but skip that page on future visits. Users have control over the cookie settings in their browser. They may choose to allow or block any or all cookies and/or to view a website in private/anonymous mode. Note that some website features may not be available when cookies are blocked.

Data Breach Policy and Protocols

Camslen Pty Ltd is committed to ensuring the security of data collected and stored. In scenarios where a data breach occurs, the Camslen Pty Ltd Data Breach Response Policy and Protocol, as linked below will be followed.

Contacting Camslen Pty Ltd with regards to privacy issues

Camslen Pty Ltd may be contacted with regards to privacy concerns via the following methods:

By post to either:

- Privacy Officer, Mooroolbark Specialist Centre, 256 Hull Road, Mooroolbark, 3138
- Privacy Officer, Molescope Skin Cancer Clinic, 262 Manchester Road, Mooroolbark, 3138

By phone to: (03) 9725 3003

By e-mail to: privacy@camslen.com.au

Please note: Reception staff will be able to respond to basic questions with regards to privacy, however, most enquiries will involve taking a message and passing it onto a supervisor/manager to respond to the enquiry.

With regards to any complaints in the way Camslen Pty Ltd has handled privacy, we encourage as first step to contact us on the methods listed above. If you have contacted us and are not satisfied with our response, or wish to dispute our response, you may contact the office of the Australian Information Commissioner via the contact details found at oaic.gov.au.

Related Policies

- Camslen Pty Ltd IT and Device Usage Policy
- Camslen Pty Ltd Data Breach Policy and Protocol
- Camslen Pty Ltd Artificial Intelligence (AI) Policy

Schedule for Review

Effective Date: October 2025

Implemented By: Lloyd McLean (Business Manager)

Review Date: July 2026

Copyright: This privacy policy has been prepared specifically for Camslen Pty Ltd