

# AOA CLINIC Privacy Policy

## Overview

AOA Consult Pty Ltd (ACN 667 325 395) ('**AOA**', '**we**' or '**us**'), ATF Oliza Trust, trading as AOA Clinic, is a virtual integrated practice of independent practitioners (psychiatrists, GPs, and mental health clinicians) providing mental health services to patients.

The services are provided via Care Plan 365, an online, protected, electronic and integrated patient management platform that facilitates efficient cooperation and communication between health care providers and professionals caring for the same patients ('**the Platform**'). You can access [Care Plan 365's](#) Privacy Policy on its website.

This policy explains how AOA collects, uses, and discloses personal information to operate the practice and provide services via the Platform.

This information is handled subject to the *Healthcare Identifiers Act 2010* (Cth), *Victorian Health Records Act 2002* (Vic) ('**Health Records Act**') and *Privacy Act 1988* (Cth) ('**Privacy Act**'). This policy is published in accordance with Australian Privacy Principles (APPs) in Schedule 1 of the Privacy Act.

When we refer to 'you' or 'your' in this policy, we may be referring to you as a patient, guardian of a patient or prospective patient or guardian of a prospective patient.

References to personal information in this policy may also include health information or culturally and linguistically diverse (**CALD**) information. Health information is a type of personal information that is about your health or disability. Health information is considered sensitive information and generally has a higher level of privacy protection than other types of personal information. CALD information is also considered sensitive information and includes information or opinion about an individual's race or ethnicity. This includes the individual's preferred language and country of birth.

If you would like to access this policy in an alternative format or language, for example if you have a disability or are from a non-English speaking background, please contact us using the contact details at the end of this page. We will take reasonable steps to provide you with alternative access.

We only collect, use, and disclose personal information where this is permitted by the Healthcare Identifiers Act, and the Privacy Act and for the purposes outlined in this privacy policy.

Specific information about the personal and sensitive information we collect, use, and disclose to carry out specific activities is outlined below.

**Please read this Privacy Policy carefully in order to understand how your personal and sensitive information is collected, held, used, or otherwise processed by us.**

AOA reserves the right to make changes or updates to this privacy policy from time to time. If this happens, we will update this privacy policy on [our website](#).

## 1. What is 'personal information'?

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable from that information.

## 2. Collecting personal information

AOA integrated practice systems and staff collect patient personal and demographic information via registration when patients are referred (or self-refer) for the first time.

During the course of providing health services, AOA's healthcare practitioners collect further personal information during consults or when otherwise providing mental health services. Personal information may also be collected from the patient's guardian or responsible person (where practicable and necessary) or from other involved healthcare providers.

With the patient's permission AOA's health practitioner will access their My Health Record and review relevant clinical information.

We collect your personal information when you use and submit information on our website or social media platforms. To create a profile on the Platform for yourself or someone else, we need to collect your personal information. This includes:

- your and/or the other person's name
- address
- contact details
- date of birth
- Medicare number
- Department of Veterans' Affairs (DVA) number
- Workcover details
- date of birth
- healthcare identifiers
- banking details

We may collect evidence of identity information or documentation from you as part of this process.

We collect this personal information directly from you. We may also collect this information from:

- the practitioner(s) that provide(s) the healthcare service to you;
- your authorised or nominated representative;
- the Platform;
- your My Health Record; and/or
- any referrer.

### **3. What is 'sensitive information'?**

We may need to collect sensitive information about you. This might include information about your health, sexual orientation, genetic or biometric information and other medical information including your medical history, mental health history, personal history, medications, allergies, adverse events, immunisations, social history, family history and risk factors.

### **4. Collecting sensitive information**

We will only collect your sensitive information where the collection of it is reasonably necessary for, and directly related to, the services provided to you.

We may also collect this information from:

- the practitioner(s) that provide(s) the healthcare service to you;
- your authorised or nominated representative;
- the Platform
- your My Health Record; and/or
- any referrer.

## 5. Why we collect personal and sensitive information

We collect personal and sensitive information for reasons including:

- identification purposes;
- Medicare/DVA/Workcover claiming purposes;
- informing the practitioner of information required to provide the health services and contact you if need be (for example, to provide results);
- for our billing purposes; and
- to provide our services to you.

## 6. Disclosure of your personal and sensitive information

AOA does not ordinarily disclose personal and sensitive information to any third party other than in the course of providing medical services. Disclosure of your personal and sensitive information on the Platform is governed by the Platform's Privacy Policy which can be found on the [Care Plan 365](#) website.

By engaging our services to be connected with AOA healthcare practitioner and providing us with your personal and sensitive information, you agree to the disclosure of the relevant information to the AOA healthcare practitioner via the Platform and any other mechanism that is used by AOA.

The limited circumstances where your personal or sensitive information may be required or authorised to be disclosed include when it is:

- to you (including your authorised representatives and nominated representatives) (personal information only);
- to provide healthcare, in accordance with any access controls set by you;
- with your consent (personal information only);
- necessary to lessen or prevent a serious threat to a patient's life, health or safety or public health or safety, or if it is impracticable to obtain a patient's consent;
- for the purpose you have been advised and have consented to during consult with an AOA healthcare practitioner or staff;
- as required during the normal operation of services provided. i.e., for referral to a medical specialist or other health service provider;
- under any relevant law;
- for a purpose relating to the provision of indemnity cover for a healthcare provider (personal information only); and/or
- necessary to obtain Medicare payments or other health insurance rebates (personal information only)..

However, for each of the above circumstances, we will only disclose the minimal amount of information necessary for the relevant purpose.

## 7. Storage and security of personal and sensitive information

The protection of your personal and sensitive information is something we take very seriously, and we are committed to keeping it secure. We take significant precautions to protect personal and sensitive information from misuse and loss, and from unauthorised access, modification, or disclosure.

Victorian law stipulates a minimum timeframe for keeping medical records. For an adult, the minimum timeframe is seven years from the date of the last entry in the patient's record. For anyone under 18, the minimum timeframe is until that person is 25 years of age.

AOA stores all personal and sensitive information securely in electronic format on the Platform. A range of measures are in place to protect information in the Platform. Those measures are outlined in the privacy policy of the Platform on the [Care Plan 365](#) website.

All information systems are encrypted by a minimum 256 bit encryption key and staff logins. All due care is taken to ensure the protection of patient privacy during the transfer, storage and use of personal and sensitive information.

A range of measures are in place to protect personal and/or sensitive information provided on or via the AOA website:

- robust multi-tiered technical security controls, which protect the integrity, confidentiality, and availability of personal and/or sensitive information;
- strong authentication and password protection processes to provide access to authorised users only and restrict unauthorised access; and
- educating our employees and implementing internal policies in respect of the above.

## 8. Collecting through our website

We will collect your personal and sensitive information if you provide it when using the AOA website. We will use and disclose this information for the purpose for which you provided it. Your first name and the content of your email, and any additional information you choose to provide, may also be used for reporting and feedback purposes.

### Website analytics and cookies

The AOA website uses Google Analytics to help us continually improve the user experience.

Google Analytics is hosted by a third party. We use Google Analytics to collect data about your interaction with our website. The type of data that we may collect includes:

- your device's IP address,
- type of device,
- browser used to visit the website,
- geographic location,
- search terms
- pages visited, and
- date and time when website pages were accessed.

Google Analytics collects information using cookies. Cookies are small data files transferred onto computers or devices by websites. We use on our website for record-keeping purposes and to

enhance the website's functionalities. AOA may collect other information about user interaction through cookies.

We may use cookie data to improve your experience when using our website.

Most browsers allow you to choose whether or not to accept cookies. You can find further information on how to manage or disable cookies in common browsers below:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Firefox](#)
- [Safari](#)

If you disable all cookies in your browser, you may find that certain sections of our website may not work.

## **9. Disclosure of personal information overseas**

Web traffic information is disclosed to Google Analytics when you visit our website. Google stores information across multiple countries.

When you communicate with us through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold your personal information overseas.

Other than via the above channels, AOA will not disclose personal or sensitive information to anyone outside Australia without need and without your consent.

## **10. Social Networking**

We use social networking services such as Twitter, Facebook, LinkedIn, and YouTube to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for [Twitter](#), [Facebook](#), [LinkedIn](#), and [YouTube](#) (a Google company) on their websites.

## **11. Accessing and correcting your personal and/or sensitive information**

Under the Privacy Act and Health Records Act, you have a right to access the personal and sensitive information we hold about you. If you cannot find the personal or sensitive information you are looking for directly through the Platform, please contact us for assistance.

If you consider the personal and/or sensitive information we hold that is about you is not accurate, complete, or up to date, please contact us as soon as possible for assistance.

## **12. How to make a complaint**

If you wish to complain to us about how we have handled your personal and/or sensitive information please write to us by sending your enquiry or complaint to our postal address (see

below) or by email to [admin@aoaclinic.online](mailto:admin@aoaclinic.online). Please address your correspondence to 'The Privacy Officer'. If you need help lodging a complaint, you can contact us - see 'How to contact us' below.

If we receive a complaint from you about how we have handled your personal and/or sensitive information we will determine what, if any, action we should take to resolve the complaint.

We will tell you promptly that we have received your complaint and then respond to the complaint within 30 days.

If you are dissatisfied with the outcome of the complaint or the way in which the complaint was handled, you may contact the [Office of the Australian Information Commissioner](#) for advice about your complaint.

### 13. Contact us

You can contact us by:

**Website:** See our [online contact form](#)

**Telephone:** 1300 624 748, 9am - 5pm (AEST/AEDT), Monday - Friday

**Email:** [admin@aoaclinic.online](mailto:admin@aoaclinic.online)

**Assisted contact:**

- If you need an interpreter, call TIS National on 131 450
- For hearing or speech assistance, contact the National Relay Service or call 1300 555 727.

### Date of last review

We may review and update this policy to take account of new laws and technology and changes to our operations. Please visit this page periodically to check for updates.

This policy was last reviewed on 5 June 2023.