



## Privacy policy

### **Garema Place Surgery Pty Ltd ACN 145 214 320 trading as Garema Place Surgery (“Garema Place Surgery”) commitment to privacy**

**Garema Place Surgery** is committed to managing personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth) and in accordance with other applicable privacy laws.

This document sets out our policies for managing your personal information and is referred to as our privacy policy.

In this privacy policy, “we” and “us” refers to **Garema Place Surgery** and its related companies and “you” refers to any individual about whom we collect personal information.

#### **About Garema Place Surgery**

**Garema Place Surgery** is a private company registered in Australia.

**Garema Place Surgery** offers secure services (“**the Services**”) that allow the safe collection, storage and disclosure of individuals’ health information.

#### **What information does Garema Place Surgery collect about you?**

##### **(a) Employer and employee users and prospective employer and employee users**

When you enquire about the Services or when you become a client or a user of Garema Place Surgery, a record is made which may include your personal information.

The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:

- (i) your name, e-mail, postal address and other contact details;
- (ii) your healthcare identifiers
- (ii) information about your employer or an organisation who you represent;
- (iii) your professional details; and
- (iv) any additional personal information you provide to us, or authorise us to collect, as part of your interaction with Garema Place Surgery.

##### **(b) Prospective employees or applicants**

We collect personal information when recruiting personnel, such as your name, contact details, qualifications and work history. Generally, we will collect this information directly from you.

We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions (for example, positions which involve working with children).

##### **(c) Other individuals**

Garema Place Surgery may collect personal information about other individuals who are not clients of Garema Place Surgery. This includes members of the public who participate in events we are involved with, individual service providers and contractors to Garema Place Surgery, and other individuals who interact with Garema Place Surgery on a commercial basis. The kinds of personal information we collect will depend on the capacity in which you are dealing with Garema Place Surgery. Generally, it would include names, contact details, and information regarding our interactions and transactions with you.

If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.

In limited circumstances, Garema Place Surgery may collect information which is considered sensitive information. For example, if you are injured at an event promoted or delivered by Garema Place Surgery we may collect health information about you in an emergency or otherwise with your consent.

You can always decline to give Garema Place Surgery any personal information we request, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about personal information we have requested, please let us know.

**(d) Users of our website**

The way in which we handle the personal information of users of our website is discussed below.

**How and why does Garema Place Surgery collect and use your personal information?**

Garema Place Surgery collects all personal information reasonably necessary to carry out the Services. This includes but is not limited to the collection of sensitive information being health information of individuals.

We may also collect information to fulfil administrative functions associated with the Services, for example billing, entering into contracts with you or third parties and managing client relationships.

The purposes for which Garema Place Surgery collects and uses personal information depends on the nature of your interaction with us, but may include:

- (i) providing the Services;
- (ii) responding to requests for information and other general inquiries;
- (iii) managing, planning, advertising and administering programs, events, competitions and performances;
- (iv) researching, developing and expanding our facilities and services;
- (v) informing you of our activities, events, facilities and services;
- (vi) recruitment processes (including for volunteers, internships and work experience); and/or
- (vii) responding to enquires and complaints

Garema Place Surgery generally collects personal information directly from you, or from a third party after receiving your express prior consent by way of a collection notice.

We may collect and update your personal information over the phone, by email, over the internet , or in person.

Garema Place Surgery also collects and uses personal information for market research purposes and to innovate our delivery of products and services.

**How does Garema Place Surgery interact with you via the internet?**

You may visit our [website](#) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to Garema Place Surgery will be managed in accordance with this privacy policy.

Garema Place Surgery's website uses cookies. A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our website and on third-party websites. You are not identifiable from such information.

You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.

Garema Place Surgery's website may contain links to third-party websites. Garema Place Surgery is not responsible for the content or privacy practices of websites that are linked to our website.

### **Can you deal with Garema Place Surgery anonymously?**

Garema Place Surgery will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for Garema Place Surgery to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs or activities we manage or deliver.

### **How does Garema Place Surgery hold information?**

Garema Place Surgery stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third party storage providers based in Australia. Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

Garema Place Surgery maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

Our website uses encryption technologies to ensure the secure transmission of information via the internet.

We take steps to destroy or de-identify information that we no longer require.

### **Does Garema Place Surgery use or disclose your personal information for direct marketing?**

Garema Place Surgery may use or disclose your personal information for the purpose of informing you about our services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.

If you opt-out of receiving marketing material from us, Garema Place Surgery may still contact you in relation to its ongoing relationship with you.

### **How does Garema Place Surgery use and disclose personal information?**

#### **(a) Individuals' personal health information**

If you are an individual whose personal health information has been uploaded to the Garema Place Surgery database (whether by themselves or by an employer with the individual's express informed consent) for the purpose of Garema Place Surgery providing the Services, Garema Place Surgery will:

- (i) permit authorised clients of Garema Place Surgery and their staff ("clients") to search the Garema Place Surgery database to ascertain if the individual has an existing record in the database or not;
- (ii) if the individual has an existing record in the database, (and unless the individual has already given their express informed consent to the release of their information in the database to clients) require

clients to request that Garema Place Surgery contact the individual via email to obtain their express informed consent to the release of their information in the database to the client;

- (iii) where Garema Place Surgery is legally obligated to, whether by statutory or other provision, disclose the individual's personal health information to a third party, in which case Garema Place will inform the individual accordingly; and
- (iv) if the individual's express informed consent is obtained, release their information to that client and/or their staff.

**(b) Clients, users and participants**

If you are a client, a user of our website or a participant in an event, we may use and disclose your personal information where this is reasonably necessary for, and relevant to, the delivery of the Service or event. We may use images or audio-visual recordings which identify you for promotional purposes where you would reasonably expect this to occur.

**(c) Contractors and other service providers**

Garema Place Surgery may disclose information to third parties we engage in order to provide our services, including contractors and service providers used for data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance/development, printing, archiving, mail-outs, and market research.

Personal information may also be shared between related and affiliated companies of Garema Place Surgery, located in Australia.

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

**(d) Administration and management**

Garema Place Surgery will also use and disclose personal information for a range of administrative, management and operational purposes. This includes:

- (i) administering billing and payments and debt recovery;
- (ii) planning, managing, monitoring and evaluating our services;
- (iii) quality improvement activities;
- (iv) statistical analysis and reporting;
- (v) training staff, contractors and other workers;
- (vi) risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- (vii) responding to enquiries and complaints regarding our services;
- (viii) obtaining advice from consultants and other professional advisers; and
- (ix) responding to subpoenas and other legal orders and obligations.

**(e) Other uses and disclosures**

We may use and disclose your personal information for other purposes explained at the time of collection or otherwise as set out in this privacy policy.

**Does Garema Place Surgery disclose your personal information overseas?**

Not at the moment but it may be that in the future that your personal information will be disclosed to overseas recipients such as offshore cloud storage providers. Currently all data collected is stored on servers that are located in Australia.

Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose

your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information.

### **How can you access or seek correction of your personal information?**

You are entitled to access your personal information held by Garema Place Surgery on request. To request access to your personal information please contact our privacy officer using the contact details set out below.

You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

However, if you consider any personal information we hold about you to be inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

### **What should you do if you have a complaint about the handling of your personal information?**

You may contact Garema Place Surgery at any time if you have any questions or concerns about this privacy policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to the privacy officer at the contact details set out below.

The privacy officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.

If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that Garema Place Surgery may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website [www.oaic.gov.au](http://www.oaic.gov.au).

### **How changes are made to this privacy policy?**

Garema Place Surgery may amend this privacy policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes.

### **How can you contact Garema Place Surgery?**

The contact details for Garema Place Surgery are:

Garema Place Surgery Privacy Officer: Anita Tammaro

practicemanager@garemaplacesurgery.com.au

026257 1000

This privacy policy was last updated on 20<sup>th</sup> October 2023