



# Privacy Policy

## Introduction

QNeurology is committed to complying with The Privacy Act 1988 for personal information by businesses and to protecting and safeguarding your privacy when you deal with us.

This Privacy Policy applies to all personal information collected by QNeurology both on and offline. This policy will explain how we collect your information, why we collect this information, how we intend to use this information, and what controls you have over our use of your information.

## How do we collect your personal information?

QNeurology will, where practicable, collect information from you when:

- you register as a patient of a Specialist at our practice and complete and submit documentation;
- you communicate with us via email, telephone, SMS, our websites or social media or make an online appointment;
- you interact with our websites;
- you communicate with medical practitioners consulting at our clinics, or staff or representatives during the course of our providing services (including information collected through electronic transfer of prescriptions (eTP), MyHealth Record / PCEHR system, for example via Shared Health Summary or Event Summary); and
- you otherwise deal with us in the course of our business.

However, we may also need to collect information from other sources such as treating specialists, radiologists, pathologists, hospitals, other health care providers, and the MyHealth record system and other third parties including:

- other healthcare professionals and health service providers involved in your care
- government agencies responsible for administering relevant entitlements and benefits (such as Centrelink, Medicare, Department of Social Services, National Disability Insurance Agency, Department of Veterans Affairs, and other government agencies responsible for home care services);
- credit reporting agencies.

We may also collect information about you from your family members, a carer, an attorney, a guardian or a person responsible for your healthcare decisions. If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you with the services you are seeking.

## How does QNeurology hold and protect your personal information?

QNeurology primarily collects and holds your personal information in electronic form / paper / visual records (x-rays, CT scans, videos and photos) and audio recording. Information held in electronic form is held securely on servers and computer systems. Certain information is collected and held in paper-based documents (such as administrative forms), which may be converted to electronic form and the original paper-based documents securely destroyed. Information which is retained in paper-based, visual and audio form is held securely at our premises or in archive facilities in Australia.

We maintain physical security over our paper, visual, audio and electronic data stores, such as locks and security systems onsite and offsite. 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.

Confidentiality agreements form part of the employment contracts for our staff members and contractors.

We take reasonable steps to:

- ensure that personal information we collect is accurate, up-to-date, complete and relevant, other than where it is only collected to provide advice in respect of a particular point in time, in which case we will seek to ensure it is accurate, complete and relevant as at that particular point in time;
- ensure that personal information we use or disclose is accurate, up-to-date, complete and relevant, having regard to the purposes for which personal information is used or disclosed;
- protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure; and
- destroy or de-identify personal information which we no longer need for the purposes for which it was collected, except where it is necessary to retain it in order to maintain ongoing records for our clients.

We cannot ensure the security of personal information which is left with you in your home or transmitted via the internet. However, we will work with you to minimise the opportunity for other individuals to access your personal information.

## How does QNeurology use and disclose your personal information?

There are circumstances where we may be permitted or required by law to disclose your personal information to third parties. For example, to Medicare, Police, insurers, solicitors, government regulatory bodies, tribunals, courts of law, hospitals, debt collection agents, the electronic transfer of prescriptions service or to the MyHealth record system.

It may also be shared with other healthcare professionals involved in your care and other persons involved in your care.

Generally, this will only happen in ways you would reasonably expect or otherwise with your consent. For example, QNeurology may disclose your personal information to your GP or to a medical specialist involved in your care; to a hospital or aged care facility if you are referred for respite or higher levels of care; or to other healthcare professionals who are involved in your care such as nurses, occupational therapists, pharmacists, physiotherapists, podiatrists, dentists and the ambulance service.

- In an emergency, we may provide personal information to other healthcare professionals and health services without your consent;
- We will do so to lessen or prevent a serious threat to public health and safety or it is impractical to obtain your consent;
- To assist in locating a missing person;
- To establish, exercise or defend an equitable claim;
- For the purpose of a confidential dispute resolution process;
- When there is a statutory requirement to do so;
- During the course of providing medical services through electronic transfer of prescriptions, MyHealth Record / PCEHRsystem (i.e. Shared Health Summary, Event Summary).

## Administration and management

QNeurology will also use and disclose your personal information for a range of administrative, management and operational purposes.

This includes:

- administering billing and payments and debt recovery;
- liaising with, and reporting to, government agencies in the administration of particular funding programs;
- administering subsidies and benefits to which you may be entitled from government agencies and other third-party payers (such as Centrelink, Medicare, Department of Social Services, Department of Veterans Affairs, and other government agencies responsible for primary care services);
- planning, managing, measuring and monitoring and evaluating our services;
- safety and quality assurance and improvement activities;
- statistical analysis and reporting;
- training staff, contractors and other workers;
- risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- responding to enquiries and complaints regarding services provided to patients;
- obtaining advice from consultants and other professional advisers; and
- responding to subpoenas and other legal orders and obligations.

## Security and Storage of Information

QNeurology places a high level of importance and value on the security of all information associated with our clients. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control.

Personal information is de-identified and/or destroyed by us when it is no longer needed by us or when the person involved asks to be removed entirely from any method of communication with QNeurology.

QNeurology retains the information provided to us by you including possibly your contact and credit card details to enable us to monitor and verify transactions and customer details and to retain

adequate records for legal and accounting purposes. This information is held on secure servers in controlled facilities, with 24-hour security.

Information stored within our network and computer systems can only be accessed by those within the organisation with authority and computer network password sanctions.

No data transmission over the internet can be guaranteed to be 100 per cent secure. As a result of this, while we aim to protect the personal information of all users, QNeurology cannot ensure or warrant the security of any information transmitted to it from any online product or service and therefore, the users do so at their own risk. Once the information is received by QNeurology, every effort is made to ensure the security of the information on the systems.

The user is ultimately responsible for the safe keeping of all login information, passwords, account information and personal data. You should aim to keep all of this secret and be careful and responsible when providing information online.

## Access to and Correction of Information

QNeurology wishes to only maintain information about its clients, customers, tenant companies, past companies and contractors that is correct, accurate, timely, relevant and appropriate.

We are more than happy to allow you to access the information we have on record for you so long as that request for information access is in accordance with the National Privacy Principles.

If you notice that your information is not correct, we will correct that information only if we are satisfied that the information relates to you.

Adequate reasoning will be provided should we not provide you with access to the information you have requested for any reason.

## Transfer of Information Overseas

QNeurology does engage with overseas entities where deidentified clinical information will be transferred, stored and disclosed. We have taken reasonable steps to ensure these entities comply with the Australian Privacy Principles. These entities include:

Flatworld Solutions; 6, Dodda Banaswadi Main Rd, Vijaya Bank Colony, Baswandi, Bengaluru, Karnataka 560043

Safeguards are taken by the entity to ensure all privacy is adhered to Australian Standards; these include:

Administrative Safeguards:

1. All staff and contractors sign comprehensive privacy and non-disclosure agreements before they commence working with us.
2. We have a privacy officer who is responsible for daily monitoring of privacy and security and for ongoing team training and the induction and training of new team members.

3. Team leaders ensure compliance and visually monitor daily operations including the appropriate use of secure log ins to all servers.

Physical safeguards for any services provided from the overseas offices include:

1. Biometric (ID Card recognition) technology is located on all entrances to work areas.
2. The office has access control and CCTV monitoring.
3. Personnel are only permitted to bring one small bag into work areas and have only one small drawer below their desks.
4. Mobile phones are not permitted to be taken into work areas. Mobile phones are locked in lockers at the start of shifts. No personnel are permitted to work from home.
5. Opaque film covers all windows where there is a view into a work area and where a computer screen may be visible from behind.
6. A security guard is present onsite monitoring the premises.

Technical Safeguards:

1. All servers are located in a secure, temperature-controlled server room with 24-hour security and monitoring.
2. All personnel work on remote Australian based servers and not on the local computers at which they sit.
3. All data is stored for 7 days and then automatically deleted from the server.
4. Access to local computers is blocked, all output devices/ports (e.g., USB, writable CD/DVD, flash) are disabled and external email is disabled on the local network.
5. We use only communication channels secured by industry standard encryption protocols.
6. Network perimeter security is implemented. This firewall ensures personnel cannot access any website that is not work related including all social media sites.

## Cookies

QNeurology collects and analyses information from the site using “IP files”.

Your IP address (the address that identifies your computer on the internet and is recognised immediately by our web server) will be logged by QNeurology anytime you visit our website to read or download information. The information that will be collected by our web server will include the date and time of your visit, the pages you view and any information you download. This information will be used for the sole purpose of our website evaluation and helping us to provide a quality site and continually improving our service.

Our web server also automatically collects non-personal information such as the type of internet browsers you use and the identification of any website you used to click through to our own. This information does not personally identify you and is only used to provide site analysis and helps us provide an effective service on our website.

## Changes to Privacy Policy

Should QNeurology make any changes to its Privacy Policy, it will post changes on this Privacy Policy page so that regular users are aware of the changes as to what information is collected, how it is used

and the way in which their information may be disclosed to others. Therefore, please refer back to this page regularly review amendments and ensure you are upto date with our Privacy Policy.

## Complaints

Any complaints regarding this privacy policy, collection and / or use of information collected by us should be directed to us via email or phone.

We will comprehensively investigate any complaints made and attempt to resolve any breach that may have occurred in relation to the collection, use or destruction of personal information held by QNeurology in accordance with the Commonwealth Privacy Legislation. If you are not satisfied with the way it is investigated or the outcome of the procedure then you may request an independent person to further investigate your complaint. This is usually the Commonwealth Privacy Officer.

## Contacting Us

Should you require any further information regarding this Privacy Policy, please contact us.

Should you require any further information on privacy legislation or the Australian Privacy Principles of Australia we recommend that you visit the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/privacy>

## Acceptance

You accept that your use of this website includes your acceptance of this Privacy Policy and the Legal Information.