

## **PRIVACY POLICY**

This privacy policy sets out how the Spectrum and Precision Group collects, holds, uses, discloses and otherwise handles personal information.

The Spectrum and Precision Group includes Spectrum Nuclear Imaging Pty Ltd ACN 616 397 516, Cardiac Imaging Specialist Pty Limited ACN 607 686 911, Precision Imaging Pty Ltd ACN 131 959 683, Spectrum Medical Imaging Pty Limited ACN 130 896 785, Spectrum Cardiac MRI Pty Limited ACN 164 431 654, Spectrum Interventional Radiology Pty Limited ACN 615 214 616, and their related bodies.

The Spectrum and Precision Group complies with the Privacy Act 1988, including the Australian Privacy Principles.

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. Special provisions apply to the collection of personal information which is sensitive information. This includes health information and information about a person's race, ethnic origin, political opinions, membership of political, professional or trade associations, religious or philosophical beliefs, sexual preferences and criminal history. In this privacy policy, all references to personal information include sensitive information unless indicated otherwise.

### **How we collect personal information**

We usually collect personal information from you directly, for example when you interact with us electronically, in person or over the phone. However, we also collect your personal information from:

- referring clinicians, practice managers and ancillary staff;
- allied health professionals (such as physiotherapists, chiropractors, osteopaths, podiatrists, dentists, nurses, therapists, pathologists);
- your immediate family members where appropriate to do so in the circumstances; and
- other third parties where required (for example in relation to workers compensation claims or Medicare).

### **What information do we collect?**

We normally collect your:

- name, title, gender, date of birth, signature, address and contact details, including contact details of third parties to contact in an emergency;
- medical history;
- Medicare, pension, health care card and other government identifiers;
- family, social and employment history and circumstances;
- health services requested or provided and the outcome or results;
- credit card and payment information;
- expressed wishes about the future provision of health services; and
- details of any feedback.

We will also collect:

- the results of any tests or procedures that we perform;
- payment and administration information;
- any other information that you or a third party provide to us in any form.

You do not have to provide any of the information we request, however if you do not do so we may not be able to provide the services that have been requested.

If you provide the personal information of a third party, whether a patient, clinician, relative or other person, you must ensure that you have their consent to do so.

### **How we use and disclose your personal information**

We will use your personal information to:

- provide services to you;
- interact with you (for example to send you reminders and results or respond to your queries, comments or complaints, and verify information provided to use);
- respond to you or third parties who have contacted us on your behalf (such as referring clinicians, allied health professionals, and family members where appropriate in all the circumstances);
- link medical records of patients to their healthcare provider;
- ensure appropriate testing;
- diagnose and interpret results; and
- facilitate billing and payments.

We may use your personal information for quality assurance activities, practice accreditation, customer satisfaction surveys, market research and statistical analysis, including reviewing, developing and improving our existing and new products and services.

We may also use or disclose your personal information:

- for our internal administrative requirements, including for management purposes;
- for funding, service monitoring, planning, evaluation and accreditation activities;
- to provide data in both an identified and de-identified form to State and Federal Government agencies in compliance with numerous legislative requirements (for example BreastScreen, Cancer Council, National Health and Medical Research Council);
- to our insurers, brokers, lawyers and other experts for the purposes of addressing liability or obtaining other advices;
- to the organisation that is funding the provision of our services to the patient such as government organisations (including Medicare Australia, WorkCover, the Transport Accident Commission), private health insurance companies or the patient's employer, as applicable;
- for planning and evaluation of accreditation activities and with our professional bodies;
- for provision of further information about medical advances in pathology/radiology and treatment options;
- where required by law, for example where we receive subpoenas or other court documents; and
- where you have otherwise expressly or impliedly consented to that use or disclosure.

We will disclose your personal information to:

- your referring clinician;
- your allied health professionals;
- your representatives (such as a guardian, carer, or family member);
- healthcare professionals we engage to assist us to provide our services;
- others where you have consented to the disclosure (for example interpreters or intermediaries);
- other third parties where required (for example your or our insurers or those involved in the management of your case such as workers compensation or transport accident claims); and
- parties involved in a prospective or actual transfer of some or all of our assets, business or shares.

We may also share your personal information between ourselves as related bodies where necessary for administrative or other purposes. All our related bodies handle personal information in accordance with this privacy policy.

If you or your health care provider require films you may collect them personally or arrange to have another person collect them on your behalf (including a delivery service or another individual), in which case you must provide written consent to this collection, including the name of the person collecting your films. We will not normally send films by mail or email due to security concerns unless you specifically request in writing that they be sent in this manner, acknowledging the inherent security risks.

We will not sell or disclose your personal information to drug companies or other health providers who are not involved in your medical care.

### **Online access to your images and reports**

We may provide your report and images to your referring clinician via a secure electronic system. The system is encrypted and requires certificates at the referrers end to allow them to de-encrypt the report and download it into their patient management system.

Other health care providers may also request access to these images for purposes relating to your medical treatment and we will provide such access with your consent.

Before being granted online access, your referring clinician or other health care provider must accept the terms set out in our terms of service, including confidentiality requirements and use restrictions.

We may also send or otherwise make available your report and/or images to you via electronic method, which would mean no hard copy report or images will be printed. In some circumstances we may provide your images or report in another format, such as CD, memory stick or hard copy.

You may also choose who gains access, by providing them with an email, QR code, webportal view and an access key to the images online. Images are accessed via a secure online cloud.

Your personal information will be accessible online via our referrer portal to your health professional. With your express consent, or the express consent of another person acting for you (such as a parent acting for a child), or in situations where we are informed that there is a serious threat to life, health or safety, we may also provide access to other health professionals.

### **De-identified information**

We may use information that we have de-identified for ongoing research of specific cases, or for the continuing education of our personnel.

### **Direct marketing**

We may use your personal information for direct marketing, for example to send you information about new developments in our business in which you may be interested, or new services that we offer from time to time. We may contact you for this purpose by mail, phone, email or SMS. Communications with you will include details for how you can opt-out from these communications.

You may also let us know using the contact details below if you no longer wish to receive any marketing communications from us. We will still contact you to provide you with relevant information in respect of your ongoing health care, such as invoices and reminders.

## **Referring clinicians and other health care providers**

Information we commonly collect about referring clinicians, practice managers, ancillary staff and other health care providers includes but is not limited to:

- name, address, telephone numbers, fax /email address and other contact details;
- details of IT systems and web addresses;
- Medicare provider numbers and billing information;
- area of specialisation;
- employment history;
- service delivery preferences, referral patterns and fees paid by referred patients;
- information gathered by client services or during practice visits or other interactions; and
- details of feedback, complaints, or suggestions.

We may use your personal information to:

- provide reliable healthcare services for patients, including contacting other healthcare providers;
- link medical records to patients and their healthcare providers;
- ensure appropriate testing;
- tailor services to your needs, as a referrer; and
- provide educational material to you and your staff, as a referrer.

## **Employment Applicants**

Information we commonly collect about employment applicants includes but is not limited to:

- name, address, email address and other contact details
- letters of application, expressions of interest and associated correspondence
- resume
- information from referees and recruitment agencies;
- information from professional bodies;
- information collected as a result of conducting reference checks (including without limitation proof of eligibility to work in Australia, criminal history, and other standard employment checks);
- notes made during the interview and selection process.

We will use this information to assess your application and during the application process.

## **Shareholders of the Spectrum and Precision Group**

We may collect personal information about shareholders of the Spectrum and Precision Group, and use that information to manage our relationship with you.

## **Anonymity and Pseudonymity**

It is impractical for persons to deal with us anonymously or by using a pseudonym.

## **Security of Personal Information**

We have procedures in place to store personal information securely to protect from misuse and loss, and unauthorised access modification or disclosure. These include:

- hard copy documents are temporarily located securely within the practice or secure storage centres, and are destroyed by a dedicated third party document destruction service after the documents have been electronically stored; where required (we take reasonable steps in the circumstances to destroy or de-identify personal information if we no longer need it for any permitted purpose.
- twenty four hour security systems
- maintaining electronic databases in a secure environment

- having a dedicated archive storage facility;
- strict access requirements; and
- staff training.

As general guidance, we will keep personal information electronically for 7 years from the last occasion we provided health services to you as an adult, or, if you were under 18 at the time of collection of your personal information, until you turn 25.

### **Accuracy of your personal information**

We use our reasonable endeavours to ensure that the personal information we collect, use and disclose is accurate, up-to-date and complete. However, the accuracy and completeness of that information can depend on the information you provide to us. We recommend that you:

- tell us if there are any errors in the information we hold; and
- inform us of any changes to your information (such as your name, address or Medicare number).

### **Access to your information**

The best way to obtain your results is in consultation with your referring health professional, who can interpret the results and explain them to you in the context of your health care.

You may request access to personal information we hold about you by contacting us using the contact details set out below. We may request additional information to identify you before correcting any personal information.

In some instances, charges may apply for the reproduction of results or images (if available). We will inform you of any costs before they are incurred.

In some circumstances your request may be denied where permitted under the Privacy Act. If your request is denied, a reason will be given to you (except if it is unreasonable to do so). You may also make a complaint, as set out below.

### **Correction of your information**

You may request that we correct any personal information we hold about you if you consider it to be inaccurate, out-of-date, incomplete, irrelevant or misleading by contacting us using the contact details set out below. We may request additional information to identify you before correcting any personal information.

If your request is denied, a reason will be given to you (except if it is unreasonable to do so). You may also make a complaint, as set out below.

### **Overseas disclosure**

We may disclose personal information outside Australia in limited circumstances. This could include:

- where an individual is participating in a clinical trial where some or all of the trial is overseas;
- when requested by a patient's treating doctor overseas;
- when requested by the patient; and
- when samples are sent overseas for expert opinion/analysis.

Our service providers include IT service providers that host our website servers, manage our IT and provide storage services such as cloud storage services. Most of our data is stored in Australia, but some may be stored on servers in the United States and Canada. We have agreements in place with each of our service providers which contain privacy and confidentiality obligations.

## **Complaints**

You may make a complaint to us if you feel that we have acted improperly or breached the Australian Privacy Principles. You may make a complaint by contacting us using the details set out below. We will endeavour to respond to your complaint within 30 days of receiving it.

If you remain unsatisfied with our response, you may contact the Office of the Australian Information Commissioner.

## **Contact details**

By email: [privacy@spectrumradiology.com.au](mailto:privacy@spectrumradiology.com.au)

## **Updates**

From time to time, the Spectrum and Precision Group will review this privacy policy, and reserves the right to amend it at any time. Any amendments will be notified by posting an updated version on any website used by a member of the Spectrum and Precision Group.