

# PRIVACY POLICY

This privacy policy is to provide information to you, our client, on how your personal information (which includes your health information) is collected and used within our organisation, and the circumstances in which we may share it with third parties.

#### Why and when your consent is necessary.

When you register or make an appointment as a client of RUBIX HEALTH, you provide consent for our Practitioners and organisation staff to access and use your personal information so they can provide you with the best possible healthcare. Only staff who need to see your personal information will have access to it. If we need to use your information for anything else, we will seek additional consent from you to do this.

# Why do we collect, use, hold and share your personal information?

RUBIX HEALTH will need to collect your personal information to provide healthcare services to you. Our main purpose for collecting, using, holding and sharing your personal information is to manage your health. We also use it for directly related business activities, such as financial claims and payments, organisation audits and accreditation.

## What personal information do we collect?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details,
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors,
- Medicare or other such numbers (where available) for identification and claiming purposes,
- healthcare identifiers,
- health fund details.

# Dealing with us anonymously.

You have the right to deal with us anonymously or under a pseudonym, unless it is impracticable for us to do so or unless we are required or authorised by law to only deal with identified individuals.

#### How do we collect your personal information?

RUBIX HEALTH may collect your personal information in several different ways.

- 1. When you make your first appointment, our organisation staff will collect your personal and demographic information via your registration.
- 2. Throughout various stages of program delivery, we collect further personal information through secure online questionnaires and physical assessments by our practitioners.

- 3. We also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment or use eHealth tools such as our exercise App for computers and mobile devices. You do not need to share your data with any other party when you use this App. Clicking the 'Do not share my information' (even in a de-identified way) will not impair your ability to use this App.
- 4. In some circumstances, personal information is collected from other sources if it is not practical or reasonable to collect it from you directly. This may include information from:
  - your guardian or responsible person,
  - other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services, or
  - your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

#### When, why and with whom do we share your personal information?

Only RUBIX HEALTH staff who need to access your information will be able to do so. We will not share your information with any third party without first obtaining your consent.

There are situations whereby RUBIX HEALTH is required to share your personal information:

- when it is required or authorised by law (e.g. court subpoenas),
- when it is necessary to lessen or prevent a serious threat to a client's life, health or safety or public health or safety,
- to assist in locating a missing person,
- to establish, exercise or defend an equitable claim,
- when there is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification),

In instances such as this, RUBIX HEALTH will always attempt to obtain your consent.

RUBIX HEALTH constantly evaluates program results to ensure best outcomes for our clients. We do this by looking at large volumes of client data that has been de-identified (i.e. your identifying details replaced with a code). This data may be shared with third parties (such as Universities or Government bodies) for research or professional development purposes. At no point will your data be re-identified and if so, we will obtain your consent beforehand.

RUBIX HEALTH will not use your personal information for marketing any of services directly to you without your express consent. If you do consent, you may opt-out of direct marketing at any time by notifying our organisation in writing.



## How do we store and protect your personal information?

All your personal information will be stored electronically in a secure, online Australian server in accordance with the Australian Privacy Act 1988 and ISO270001 Standard.

The protection of your health data is the highest priority for RUBIX HEALTH. Confidentiality agreements are held with all staff and contractors and a dedicated Information Technology team ensures RUBIX HEALTH's policies comply with the National eHealth Security and Access framework. We do not retain any credit card numbers. Further details can be sought in our **Information Security Policy**.

#### How can you access and correct your personal information at our organisation?

You have the right to request access to your personal information and provide corrections.

RUBIX HEALTH acknowledges clients may request access to their medical records. We require you to submit a signed request in writing and RUBIX HEALTH will respond with the relevant information within 30 days. You will be charged an administration fee to cover the costs of complying with your request.

RUBIX HEALTH will take all reasonable steps to correct your personal information where the information is not accurate or up to date. To this end, periodically, we will ask you to verify that your current personal information is correct.

You may also request that RUBIX HEALTH correct or update your information and we are happy to comply without charge. RUBIX HEALTH would prefer the information to be relayed in person to the appropriate staff member, to ensure the security of your data.

# How can you lodge a privacy-related complaint, and how will the complaint be handled at our organisation?

We take complaints and concerns regarding your privacy very seriously.

We would request that you provide any complaints or concerns in writing to 55 Bussell Highway, Busselton, 6280 or email <a href="mailto:admin@rubixhealth.com.au">admin@rubixhealth.com.au</a>. RUBIX HEALTH will attempt to resolve it in accordance with our procedures and any legislative requirements within 30 days.

You may also contact the Office of the Australian Information Commissioner (OAIC). For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992.

# Policy review frequency.

This privacy policy will be reviewed regularly to ensure it represents any changes that occur in our procedures. If this policy is amended, RUBIX HEALTH will notify you directly (by email or post).

If you wish to discuss our privacy policy further with a member of staff, you may phone us on (08) 9752 4174 or email us at admin@rubixhealth.com.au.