

1. OUR COMMITMENT TO YOUR PRIVACY

North Eastern Urology (the **Practice, we, us or our**) takes your privacy seriously. Protecting the privacy, confidentiality and security of your personal and health information is an essential part of providing safe and high-quality health care.

This Privacy Policy explains how we collect, hold, use and disclose your personal and health information, and how you may:

- access information we hold about you;
- request correction of information that is inaccurate, incomplete, out of date or misleading;
- make a privacy complaint; and
- contact us about our privacy practices.

The Practice is committed to complying with applicable privacy laws, including:

- the **Privacy Act 1988 (Cth)** and the Australian Privacy Principles (APPs), where applicable;
- the **Health Records Act 2001 (Vic)** and the Victorian Health Privacy Principles (HPPs);
- the **Health Records Regulations 2023 (Vic)**; and
- other applicable Commonwealth and Victorian laws relating to privacy, health records and confidentiality.

This Privacy Policy should be read together with any specific privacy or collection notices provided to you when we collect your information.

Where required by law, we will take reasonable steps to notify you, at or before collecting your personal information, of the matters required under applicable privacy laws.

2. WHAT INFORMATION DO WE COLLECT?

The Practice may collect and hold personal and health information that is reasonably necessary for providing and managing your health care.

Depending on the circumstances, this may include:

- your name, date of birth, address, telephone number and email address;
- Medicare number and private health insurance details;
- emergency contact details;
- information about your medical history and current health;
- information about your physical or mental health;
- information about previous or current treatment;
- information about medications, allergies and adverse reactions;
- clinical notes and records of consultations;
- referrals and correspondence from other health professionals;
- pathology, radiology and other diagnostic results and reports;
- information received from hospitals and other healthcare providers;

- information relating to procedures, admissions and treatment;
- information required for billing and payment purposes, including relevant financial information; and
- information required to manage appointments, administration and communications with you.

Health information is sensitive information under the Privacy Act 1988 (Cth) and is subject to additional privacy protections.

We will only collect information that is reasonably necessary for the functions and activities of the Practice.

3. HOW DO WE COLLECT YOUR INFORMATION?

Where reasonably practicable, we will collect information directly from you.

We may collect information:

- when you make an appointment;
- when you attend a consultation or procedure;
- when you complete registration or medical history forms;
- by telephone, email or other electronic communication;
- through our website or online services;
- when you provide information to our reception or administrative staff;
- when you make or receive payments; and
- during consultations with our doctors or other healthcare professionals.

In some circumstances, we may collect information about you from other people or organisations where this is reasonably necessary for your care or otherwise permitted or required by law.

This may include:

- your referring doctor;
- other treating doctors or specialists;
- hospitals;
- pathology providers;
- radiology and imaging providers;
- pharmacies;
- allied health professionals;
- your carer or authorised representative;
- your immediate family, where appropriate;
- Medicare or your health insurer; and
- other healthcare or service providers involved in your care.

Where we collect information about you from someone other than you, we will do so in accordance with applicable privacy laws.

4. WHY DO WE COLLECT YOUR INFORMATION?

We collect, hold and use your information for purposes including:

- assessing, diagnosing and treating your health conditions;
- providing ongoing medical care;
- arranging referrals, investigations and procedures;

- communicating with you about your health care and appointments;
- coordinating your care with other healthcare providers;
- maintaining accurate and appropriate health records;
- processing Medicare, private health insurance and other claims;
- processing payments and managing accounts;
- complying with legal and regulatory obligations;
- managing the operations and administration of the Practice;
- managing risks, incidents and complaints;
- quality assurance and improvement of our services;
- education and training of healthcare professionals, where permitted by law; and
- other purposes that are permitted or required by law.

We will not collect personal or health information by unlawful or unfair means.

5. USE AND DISCLOSURE OF YOUR INFORMATION

We may use or disclose your information where this is reasonably necessary for your health care, for a purpose you would reasonably expect, with your consent, or where otherwise permitted or required by law.

This may include disclosure to:

- doctors and other healthcare professionals involved in your care;
- specialists to whom you are referred;
- hospitals;
- pathology providers;
- radiology and imaging providers;
- pharmacies and other healthcare providers;
- allied health professionals;
- Medicare;
- your private health insurer;
- organisations involved in processing payments or claims;
- Practice staff who need the information to perform their duties;
- information technology, records management, medical transcription, clinical documentation or other service providers where reasonably necessary to operate the Practice and subject to appropriate privacy and security arrangements; and
- government agencies, courts, tribunals, insurers, lawyers or other parties where disclosure is authorised or required by law.

We may also disclose information where necessary to prevent or lessen a serious threat to a person's life, health or safety, where permitted by law.

We will only disclose the information reasonably necessary for the relevant purpose.

6. REFERRALS AND SHARING INFORMATION WITH OTHER HEALTHCARE PROVIDERS

Providing safe and coordinated medical care often requires us to exchange information with other healthcare providers.

For example, where you are referred to another specialist, hospital, pathology provider or radiology provider, relevant information may be provided to that provider so that they can appropriately assess and treat you.

We may also receive reports and results from those providers and include them in your medical record.

7. EDUCATION, TRAINING AND QUALITY IMPROVEMENT

The Practice may use health information for education, training, quality assurance, research or improvement of healthcare services where permitted by applicable law.

Where practicable and appropriate, information used for these purposes will be de-identified.

Where identifiable information is proposed to be used or disclosed, we will obtain consent or otherwise ensure that the use or disclosure is authorised or permitted by law.

If you have concerns about your information being used for education or training, please discuss this with your treating doctor or the Practice Manager.

8. DIRECT MARKETING

The Practice does not currently use or disclose your personal or health information for direct marketing of goods or services.

If this changes, we will comply with the consent and other requirements of applicable privacy laws.

9. OVERSEAS DISCLOSURE AND SERVICE PROVIDERS

The Practice uses external service providers to assist with functions such as practice management, electronic medical records, email and communications, clinical documentation, medical transcription, information technology, billing, appointment management, data storage and other administrative services.

These service providers may handle personal and health information on behalf of the Practice where reasonably necessary to provide healthcare services or operate and administer the Practice.

The Practice takes reasonable steps to ensure that service providers handling personal or health information on our behalf have appropriate privacy, confidentiality and security arrangements.

Some service providers, or their technology partners and subcontractors, may store, process or access personal information outside Australia.

Where personal information is likely to be disclosed to an overseas recipient, the Practice will comply with applicable privacy laws, including the Australian Privacy Principles concerning overseas disclosure.

Where required and practicable, this Privacy Policy will identify the countries in which overseas recipients are likely to be located. Where it is not practicable to identify specific countries, relevant regions may be identified.

The Practice will take reasonable steps to ensure that overseas recipients handle personal information in accordance with applicable privacy requirements.

If you have questions about the use of external service providers or the handling of your personal or health information, please contact the Practice Manager.

10. MY HEALTH RECORD

Where applicable, the Practice may access, use or contribute information to your **My Health Record** in accordance with the **My Health Records Act 2012 (Cth)** and other applicable laws.

Information contained in or accessed from My Health Record will be handled in accordance with the specific privacy and security requirements applying to the My Health Record system.

11. ACCURACY AND QUALITY OF INFORMATION

We take reasonable steps to ensure that personal and health information we hold is accurate, complete, up to date and relevant.

You can assist us by notifying us if your personal details or other information have changed.

If you believe information in your record is inaccurate, incomplete, out of date or misleading, you may request that it be corrected. See section 17 of this policy.

12. HOW WE PROTECT YOUR INFORMATION

The Practice takes reasonable steps to protect personal and health information from:

- misuse;
- interference;
- loss;
- unauthorised access;
- unauthorised modification; and
- unauthorised disclosure.

Depending on the circumstances, safeguards may include:

- secure premises and storage areas;
- access controls and user permissions;
- passwords and authentication controls;
- secure electronic systems;
- appropriate backup and recovery arrangements;
- staff confidentiality obligations and privacy training;
- secure handling and disposal of paper records;
- appropriate security measures for electronic communications and devices; and
- procedures for identifying, managing and responding to privacy and information-security incidents.

Access to personal and health information is limited to people who need it for legitimate Practice, healthcare or legal purposes.

13. STAFF PRIVACY AND CONFIDENTIALITY

All Practice staff, doctors, contractors and other persons who have access to personal or health information are required to maintain the confidentiality and security of that information.

The Practice provides appropriate privacy and confidentiality training and guidance to staff as part of their responsibilities. Training may include:

- privacy and confidentiality obligations;
- appropriate access to and use of patient information;
- secure handling of health records and personal information;
- appropriate use of email and electronic communications;
- information security and password requirements;
- recognising and reporting privacy incidents and data breaches;

- appropriate use of Practice systems and external service providers; and
- obligations concerning the collection, use and disclosure of personal and health information.

Access to patient information is limited according to staff roles and legitimate healthcare or administrative requirements.

Staff are required to comply with the Practice's privacy, confidentiality, information security and records management procedures.

The Practice maintains appropriate records of staff privacy and confidentiality training.

Privacy and confidentiality obligations continue after a staff member, contractor or other authorised person ceases to work with the Practice.

14. DATA BREACHES AND PRIVACY INCIDENTS

The Practice takes privacy and information-security incidents seriously.

If we become aware of a suspected loss, unauthorised access, disclosure or other privacy breach, we will assess and manage the incident in accordance with our internal procedures and applicable law.

Where a breach is required to be notified under the **Notifiable Data Breaches scheme** or other applicable Victorian or Commonwealth legislation, we will make the required notifications.

Where appropriate, we will also take steps to contain the incident, reduce the risk of harm and prevent recurrence.

15. RETENTION AND DESTRUCTION OF HEALTH INFORMATION

The Practice retains health information for the periods required by applicable Victorian and Commonwealth laws.

Under the **Health Records Act 2001 (Vic)**, a private health service provider generally must not delete health information until at least seven years have passed since the individual was last provided with a health service, or, where the individual was under 18 years of age when last provided with a health service, until the individual reaches 25 years of age.

We will not destroy or de-identify health information where we are required by law to retain it.

When information is no longer required to be retained, we will take reasonable steps to securely destroy or de-identify it in accordance with applicable legal requirements and our records-management procedures.

16. ACCESS TO YOUR PERSONAL AND HEALTH INFORMATION

You generally have a right to request access to personal and health information that we hold about you, subject to exceptions under applicable law.

Requests for access should be made in writing to the Practice Manager.

We may need to verify your identity before providing access.

In some circumstances, access may be refused or limited where permitted or required by law. If this occurs, we will explain the reasons where we are legally permitted to do so.

We may charge a reasonable fee for providing access where permitted by law. Any applicable fee will not exceed the maximum amount permitted under the **Health Records Act 2001 (Vic)** and applicable regulations.

We will not charge a fee for requesting correction of your health information.

17. HOW TO REQUEST ACCESS

To request access to your information, please contact:

Practice Manager
North Eastern Urology
11 Martin Street
Heidelberg VIC 3084

Telephone: 03 9457 4445
Email: office@neu.net.au

We will respond to your access request as soon as practicable and, subject to applicable law, no later than **45 days** after receiving the request.

18. CORRECTION OF YOUR INFORMATION

If you believe information we hold about you is inaccurate, incomplete, out of date or misleading, you may request that it be corrected.

Requests should be made in writing and should identify the information you believe requires correction and, where possible, provide the information you believe to be accurate.

We will consider your request and take reasonable steps to correct information where appropriate and required by law.

If we do not agree that information should be corrected, we will explain the reason where required and permitted by law.

Where applicable, you may provide a written statement identifying the information you believe should be corrected, and we will keep that statement with the relevant health information in accordance with the **Health Records Act 2001 (Vic)**.

Where we correct health information that has previously been disclosed to another health service provider, we will take the steps required by applicable law to notify that provider of the correction.

We will respond to your correction request as soon as practicable and, subject to applicable law, no later than **30 days** after receiving the request.

There is no fee for requesting correction of health information.

19. ANONYMITY AND PSEUDONYMITY

Where lawful and reasonably practicable, you may ask to deal with us anonymously or using a pseudonym.

However, this may not be practicable where we need to identify you in order to:

- provide safe and appropriate medical care;

- maintain an accurate medical record;
- communicate with you about your treatment;
- process Medicare or health insurance claims;
- comply with legal obligations; or
- protect your health or safety.

We will explain this to you where relevant.

20. WHAT HAPPENS IF YOU DO NOT PROVIDE INFORMATION?

You are generally not obliged to provide personal information to us.

However, if you do not provide information that is reasonably necessary for your medical care, we may be unable to provide some or all of the services you require.

For example, failure to provide relevant medical history, medication information, allergy information or other clinically relevant information may affect our ability to safely assess and treat you.

If you have concerns about providing particular information, please discuss them with your treating doctor or the Practice Manager.

21. PRIVACY COMPLAINTS

We encourage you to contact us first if you have a concern about the way we have handled your personal or health information.

You may make a privacy complaint verbally or in writing. We prefer written complaints so that we can properly understand and investigate your concerns.

Please contact:

Practice Manager
North Eastern Urology
 11 Martin Street
 Heidelberg VIC 3084

Telephone: 03 9457 4445
Email: office@neu.net.au

We will acknowledge your complaint and investigate it in accordance with our complaints procedures and applicable legal requirements.

We will aim to respond to your complaint within a reasonable period and will keep you informed if additional time is required.

There is no fee for making a privacy complaint to the Practice.

22. EXTERNAL PRIVACY COMPLAINTS

If you are dissatisfied with the Practice's response, or if you prefer to make an external complaint, you may contact the relevant external regulator.

Health Complaints Commissioner – Victoria

The **Health Complaints Commissioner (HCC)** deals with complaints about health services and health information under Victorian legislation, including the **Health Records Act 2001 (Vic)**.

Website: hcc.vic.gov.au

Telephone: 1300 582 113

Office of the Australian Information Commissioner

The **Office of the Australian Information Commissioner (OAIC)** deals with complaints about organisations covered by the **Privacy Act 1988 (Cth)**, including applicable Australian Privacy Principles.

Website: oaic.gov.au

Telephone: 1300 363 992

You may also seek independent legal advice about your rights.

23. CONTACTING US ABOUT PRIVACY

If you have questions about this Privacy Policy or how we handle your personal or health information, please contact:

Practice Manager
North Eastern Urology
11 Martin Street
Heidelberg VIC 3084

Telephone: 03 9457 4445

Email: office@neu.net.au

24. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes to our practices, technology, services or applicable laws.

The current version will be available from the Practice and, where applicable, on our website.

Last reviewed: 6th October 2026