

# Dr Charles Cope, Infinity Skin Clinic and North Shore Cosmetic Surgery Privacy Information Policy

This policy sets out the processes that will be followed by Dr Charles Cope, Infinity Skin Clinic and North Shore Cosmetic Surgery and its' employees in protecting information held by us. This policy establishes the reasons for collecting personal information, how the information will be used and to whom if necessary the information is disclosed.

Dr Charles Cope Pty Ltd, Infinity Skin Clinic and North Shore Cosmetic Surgery are open and transparent in the management of our patients/clients' personal information. We are committed to protecting the privacy of our patients and clients and of other individuals and organisations that communicate with our practices. We comply with the Australian Privacy Principles (APPs) and will update our policy and procedures when required to continue to adhere to the APPs.

A copy of our Privacy Policy is available on our websites – [www.drcharlescope.com.au](http://www.drcharlescope.com.au) and [www.infinityskin.com.au](http://www.infinityskin.com.au) and can be obtained in writing, free of charge, on request.

If you have specific concerns please contact our office on (02) 9908.3033 or email [info@drcharlescope.com.au](mailto:info@drcharlescope.com.au).

The Privacy Act gives individuals the right to complain if you think we have not complied with the Australian Privacy Principles in handling your personal information. We ask that in the event that you wish to complain about a breach of our policy, please initially address your complaint in writing to [info@drcharlescope.com.au](mailto:info@drcharlescope.com.au) with 'Privacy Officer' as the subject. We will address your complaint as directly as possible, usually within 48 hours, and liaise with you during the period of the investigation. We regard the matter very seriously and will attempt to correct any breach as soon as practical. In the event a breach does occur, we will address our procedures immediately so as not to allow another breach of that nature. An individual has the right to contact the Office of the Privacy Commissioner on 1300 363 992 or go to [www.privacy.gov.au](http://www.privacy.gov.au)

## Collection of Personal Information

DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY collects and holds information about patients and clients as necessary to ensure the proper functioning and operation of our medical clinics. The information held by DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY is limited to that information which is directly provided by patients and clients in the form of patient and client registrations, relatives and carers of patients when directly involved in their care, Medical Practitioners and other Allied Health Practitioners, Insurance Companies, Health funds, Medicare Australia and

other Government bodies, when they have the authority to do so. We also collect and hold changes to patient and client details when updated. The only additional information we may hold regarding you is unsolicited correspondence that is received from government organisations or other medical practitioners. In the event that we receive unsolicited personal information we will, within a reasonable period after receiving the information, determine whether or not we could have collected the information directly. If so, we may use, hold or disclose this personal information if in accordance with the other principles outlined in this policy.

We only collect and hold personal information necessary for our organisation to function and to conduct our business activities. We use only fair and lawful ways to collect personal information and will gather this directly from you or your authorised representative unless neither reasonable nor practical to do so.

We will endeavour to make you aware of why we are collecting the information, in what event it would be released and will take reasonable steps to ensure you are aware of the information we hold on you, even if we have collected it from someone else.

You have a right to know what information we hold on you. You may seek access to the personal information we hold on you and request the correction of such information when required. We will take reasonable steps to ensure that the personal information we hold, use and/or disclose is accurate, complete and up-to-date.

## Use of Personal Information

As noted above, DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY holds information as advised by you or your representative. This may include your addresses, telephone numbers, email and other contact details, information about your medical history, date of birth, marital status and other information of a personal nature which we deem is necessary to conduct our business with you.

Information held about you will only be used to fulfill our responsibility to you. We only gather, use and/or disclose personal information for the primary purpose for which it was collected. It may be used for a secondary purpose when it would be reasonably expected by you that we do so, you have given your consent, or when we are required by law. We may use or disclose the information when a permitted health situation exists (as defined in clause 16B of *The Privacy Amendment (Enhancing Privacy Protection) Bill 2012* (Cth)).

## Disclosure of Personal Information

DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY will only disclose your personal information for the purposes for which it is collected or are otherwise required by law to do so. The types of organisations we may be required to disclose your personal information include (but not limited to):

- \* Other medical practitioners, allied health practitioners, hospitals, suppliers and health funds
- \* Government institutions when required by law (eg Medicare Australia, the Department of Veterans' Affairs and the Department of Human Services)
- \* Solicitors and insurance companies involved in your care and when we have a signed authority from you to do so or when you have directed us to contact the solicitors and/or insurance company on your behalf by supplying us with the relevant contact details
- \* DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY's Insurance Company and other business organisations if required to ensure the business activities of the our companies are insured or otherwise covered. Disclosure of personal information if necessary in this case is of a general nature and is de-identified.

It is unlikely that we would be required to disclose your personal information to overseas recipients but in the event that this may be necessary, your information will be de-identified to the extent that your privacy is respected.

At times, it may be necessary for other organisations or contractors to view or access information to facilitate the operation of our practices. Where this occurs, such access shall be limited to necessary information only and in accordance with the terms of this policy.

If you do not wish for your personal information to be disclosed to another organisation please indicate at the time your information is collected. This will be noted on your patients and/or client records and every effort will be made to respect this wish.

Except when it is reasonably expected that we do so, requests made to access your personal details, will not be granted unless we receive express permission by you. Under no circumstances will staff provide details of your personal information when it is not necessary. DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY will only disclose your details when medically necessary and in order to perform our undertaking to you. All staff at our Clinics are aware of our policy in terms of protecting the privacy of personal information and of the legislation regarding this.

If you would like to check what information is held about you, you can contact Dr Charles Cope and North Shore Cosmetic Surgery, by emailing [info@drcharlescope.com.au](mailto:info@drcharlescope.com.au) or telephoning 02.9908.3033 or Infinity Skin Clinic by emailing [info@infinityskin.com](mailto:info@infinityskin.com) or telephoning 02.9904.3500.

## Data Quality and Security

DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY is committed to ensuring that the personal information held about you is maintained in a form that is accurate, complete and up-to-date. The storage, use and, where necessary, the transfer of your personal information will be undertaken in a secure manner that protects your privacy.

All employees and contractors to the DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY are required to sign confidentiality agreements and all staff are trained on our confidentiality policy.

Over and above the provisions of this privacy policy, you can be assured that information you provide to the DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY particularly with regard to sensitive matters will be kept strictly confidential as far as legally possible.

Where external organisations require access or to view information held by us, they will be required to provide details of their privacy policy and confidentiality agreements, as appropriate.

We will take reasonable steps for the circumstance to protect the information we hold from misuse, interference and loss and from unauthorised access, modification or disclosure.

In circumstances where the information we hold is no longer required by us and we are not required by law to retain the information we will take reasonable steps to destroy the information in a manner that protects the privacy of the information or ensure that it is de-identified.

## Openness

This policy and other information on privacy is available to our patients and clients, staff and the public. If you require further information on information handling processes within the DR CHARLES COPE AND/OR NORTH SHORE COSMETIC SURGERY please contact our office by emailing [info@drcharlescope.com.au](mailto:info@drcharlescope.com.au) or for INFINITY SKIN CLINIC please email the request to [info@infinityskin.com.au](mailto:info@infinityskin.com.au).

## Access to and Correction of Your Personal Information

DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY patients and clients are entitled to request access and seek corrections in relation to personal information. The request for access to personal information should be made directly to our offices via email or in writing. We can confirm personal details held on file regarding you however you must be able to confirm your identity on request. If DR CHARLES COPE, INFINITY SKIN CLINIC AND/OR NORTH SHORE COSMETIC SURGERY have concerns regarding any requests for access, we reserve the right to respond in writing.

In the event that we charge for giving access to personal information, the charge will not be excessive and will not apply to the making of the request.

We are not required to give access to the personal information we hold to the extent that:

- a. we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- b. giving access would have an unreasonable impact on the privacy of other individuals; or
- c. the request for access is frivolous or vexatious; or
- d. the information relates to existing or anticipated legal proceedings between us, and the information would not be otherwise accessible by the process of discovery in those proceedings; or
- e. giving access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations; or
- f. giving access would be unlawful; or
- g. denying access is required or authorised by or under an Australian law or a court/tribunal order; or
- h. both of the following apply:
  - i. we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the our functions or activities has been, is being or may be engaged in;
  - ii. giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or

- i. giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- j. giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process.

If we refuse to access, we will provide a written notice of the reason(s) for refusal except when unreasonable to do so.

If we are satisfied that the information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading and/or you request us to correct the information, in reasonable circumstances, we will correct that information to ensure that having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading. If relevant, we will notify third parties to whom we have previously disclosed the information unless it is impracticable or unlawful to do so.

In the event that we refuse to correct the information we hold on you, we will provide a written explanation to you of the reason(s) for refusal and the opportunities available to you to complain about the refusal, when it is reasonable to do so. In circumstances where we have refused to correct personal information we hold on you, that you have requested us to do so, if you also request us to associate a statement from you that the information is inaccurate, out of date, incomplete, irrelevant or misleading we will take reasonable steps to do so.

When requests regarding access and/or correction of your personal information are made, we will deal with these requests within a reasonable period after the request is made and will not charge you for making the request, correcting the personal information or associating the statement with the personal information (whichever the case may be).

## Related Bodies

DR CHARLES COPE, INFINITY SKIN CLINIC AND NORTH SHORE COSMETIC SURGERY use and disclose information which may identify you, between these entities when required for related business activities and for the primary purpose for which the information was collected.

## Direct Marketing

We may use or disclose personal information for the purpose of direct marketing if we have directly collected the information from you and you would reasonably expect us to use or disclose the information for that purpose.

We will provide a simple means by which you can easily request not to receive direct marketing from our organisations. You may request at any stage that we cease direct marketing to you.

When requested to be removed from direct marketing to you by us, we will give effect to the request within a reasonable period after the request is made.

We will not use or disclose any sensitive information we hold on you for the purpose of direct marketing.

We will not provide your details to any other organisations for the purpose of direct marketing.