



PRIVACY POLICY (IRIS Imaging)

We are committed to protecting our patients' and prospective patients' privacy through explaining our practices, only collecting, using or disclosing information as is necessary for health purposes, or with patients' consent, and resolving any privacy-related problems as quickly as possible.

IRIS Imaging's Privacy Statement sets out how we collect, use, disclose and otherwise handle and retain personal information (including sensitive (health) information) in accordance with our obligations under the Privacy Act 1988 (Privacy Act) and other relevant health privacy legislation.

Our Privacy Statement also applies to personal information that we collect and hold about referring Health Professionals (and their nominees), Medical Specialists and hospital staff (and their nominees), other health service providers, individuals who supply goods and services to IRIS Imaging, employment applicants and other individuals that we have dealings with.

Why we collect and hold your personal information

IRIS Imaging collects and retains personal information (including sensitive (health) information) in order to provide:

- quality medical imaging services, assist in the provision of medical care to patients and prospective patients; and
- patient-related services to referring Health Professionals and/or other health service providers and their respective nominees.

Personal information is also collected from, and about, employment applicants and held by IRIS Imaging for employment-related purposes and other individuals with whom we have business dealings.

Generally, we collect personal information directly from you, however, we will also collect information about you from third parties, including from your referring Health Professional and/or Medical Specialist.



The kinds of personal information we collect and hold

The main categories of personal information collected and held by IRIS Imaging are:

- name;
- address;
- phone number(s);
- email address;
- date of birth; and
- gender.

IRIS Imaging also collects and holds sensitive (health) information from others in the course of providing health services to you including but not limited to:

- the results of any tests or procedures;
- information about your past clinical history (eg medication taken, previous test results, pathology results, etc) and other circumstances (including family, social, medical or employment history);
- information provided by your referring Health Professional and/or Medical Specialist that is necessary in the context of your treatment;
- information provided by other third parties (such as from a family member, authorised representative, or from an Allied Health Professional (such as from a physiotherapist, chiropractor, osteopath, podiatrist, dentist, nurse, etc));
- payment and administrative information (such as your Medicare number and other individual health identifiers, Workers Compensation insurance, Transport Accident Compensation, private health insurance or billing details);
- information required or authorised under an Australian law or a court/tribunal order; and/or
- any other information collected directly from you (including verbally) when you attend our clinics, write to or call us or contact made through our website.

If you choose not to provide your personal information (including sensitive (health) information) to IRIS Imaging, we will be unable to provide you with the services you request.

How we use your personal information

IRIS Imaging will use your personal information (including sensitive (health) information) for the purposes of:

- making an assessment of your health status;



- providing a specialist medical report about your health to your referring Health Professional and/or Medical Specialist or to third parties (such as to a family member, authorised representative, or Allied Health Professional, etc);
- providing your treatment and ongoing health care (unless you have notified us otherwise);
- providing internal administrative services (such as billing and collection of any outstanding debts);
- sending out appointment reminders;
- notifying relevant organisations (such as medical defence organisations, insurance companies and/or legal advisors) of an incident/accident when a claim of medical malpractice has been alleged;
- ongoing research of specific cases for the continuing education of professional personnel (all information is de-identified prior to use);
- quality assurance activities, practice accreditation, customer satisfaction surveys, statistical analysis, providing medical imaging information and complaint handling;
- assessing and/or sourcing candidates for employment and processing their applications; and/or
- responding to messages/enquiries you submit through our website.

Disclosure of your personal information

IRIS Imaging does not sell or disclose personal information (including sensitive (health information) about our patients to drug companies or other health organisations/persons who are not involved in your medical care.

IRIS Imaging will sometimes need to use and disclose personal information (including sensitive (health) information) about you where it is reasonably necessary and relevant in the context of your treatment to organisations outside of IRIS Imaging for medical, ethical, insurance, legal and/or procedural reasons. These organisations may include:

- your referring Health Professional, nominees of your referring Health Professional (for example employees and other Health Professionals in your referring Health Professional's clinic) and any 'copied to' Health Professional;
- consultant Medical Specialists or other registered Health Professionals who inform us they are involved in your ongoing health care outside of IRIS Imaging and who have been requested to provide further advice on your medical condition or to assist in responding to enquiries submitted through our website;
- hospital medical staff;
- registered Health Professionals granted access to IRIS Imaging's secure web-based password-protected Referrer Portal (see below);



- local contractors whom we have partnered with, under strict confidentiality and privacy requirements, including those that relate to crossborder disclosure, to provide services to our business operations;
- your representative(s) (eg a guardian, carer, translator/intermediary and/or authorised representative (such as a family member or legal advisor));
- health services or enforcement bodies in situations where IRIS Imaging is informed that there is a serious threat to life, health or safety;
- insurers (such as Medicare, Workers Compensation insurer, Transport Accident insurer or your private health fund) for the purpose of benefits payable or other third parties for billing/accounting purposes;
- our professional advisors (such as auditors and legal advisors);
- government and regulatory authorities and other organisations, as required or authorised by or under an Australian law; and/or

You can contact IRIS Imaging Operations Manager if you have any questions around the disclosure of your personal information.

IRIS Imaging will de-identify personal information (including sensitive (health) information) about you for use and disclosure of that de-identified information to organisations outside of IRIS Imaging for the purposes of analysing our service quality and timeliness. De-identified personal information (including sensitive (health) information) may also be used internally for educational purposes.

Accuracy of your personal information

IRIS Imaging endeavours to ensure that the personal information (including sensitive (health) information) we collect, use and disclose is accurate, up-to-date and complete. The accuracy and completeness of that information depends 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 and correction of your information

The best way to obtain your results is in consultation with your referring Health Professional, so that they can interpret the results and explain them to you in the context of your health care. Your imaging findings are only one aspect of your health assessment. Your



referring Health Professional is in the best position to discuss the imaging results and balance it with your other examination findings and other health test results.

You may, however, request access to personal information we hold about you. 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 for specific legal reasons as set out in the Privacy Act, including if the request is vexatious or if a criminal investigation is under way.

You may also request that we correct the personal information we hold about you if you consider it to be inaccurate, out-of-date, incomplete, irrelevant or misleading.

You may request access to, and/or correction of, your personal information by contacting IRIS Imaging. In order to maintain the security of your personal information, confirmation of your personal details, as well as date of last visit and type of test taken, will generally be required before copies of information will be supplied.

If your access or correction request is denied, a reason will be given to you (except if it is unreasonable to do so) and we will inform you of the mechanisms available to complain about the refusal (see Complaints section below).

Data security

All reasonable steps are taken to protect your personal information (including sensitive (health) information) within IRIS Imaging from misuse, interference and loss, and from unauthorised access, modification or disclosure. Records are held securely for future retrieval in accordance with applicable regulatory and legislative requirements and good business practice. If IRIS Imaging no longer needs, or is required, to retain information, IRIS Imaging will take reasonable steps in the circumstances to destroy the information or will ensure that the information is de-identified.

IRIS Imaging is subject to strict obligations under State and Territory laws as to the retention of health information and records. Generally, as a minimum, we retain health information as follows:

- in the case of health information collected while an individual was an adult – for 7 years from the last occasion we provided health services to the individual; or
- in the case of health information collected while an individual was under the age of 18 years – until the individual turns 25.
- only obtaining information about your health, as is necessary for health purposes, in accordance with this Privacy Statement or with your consent;



- keeping your health information secure;
- giving you reasonable access to the information we have concerning you;
- not disclosing this information outside the organisation without your consent or otherwise contrary to this Privacy Statement, except where legally authorised or required to do so;
- providing you with a simple complaints mechanism for complaints relating to privacy issues;
- ensuring a process for working with the Office of the Australian Privacy Commissioner to resolve any complaints that cannot be resolved directly with you;
- providing written procedures and instructions for staff to ensure that privacy processes are adhered to;
- ensuring IRIS Imaging's external (including offshore) contractors comply with the Privacy Act and other relevant laws; and
- continuing to review and improve our privacy practices.

Online access by registered Health Professionals to your medical images and reports

IRIS Imaging provides a secure web-based password-protected Referrer Portal for registered Health Professionals and hospital medical staff to access patient images and reports. Your personal information (including sensitive (health) information) (such as images and reports) may be made available through this portal. Users of this service are subject to an obligation to collect health information with your consent and, in many cases, are bound by codes of practice that deal with obligations of professional confidentiality relevant to their profession.

Health Professionals will apply to IRIS Imaging for a username and password in order to access this service. Before a Health Professional is granted online access they must accept the terms set out in a User Access Agreement stating that the information is required in order to provide a medical service and that it will not otherwise be used or knowingly shared or disclosed. Our systems trace, record and store indefinitely all access activity on every patient file.

Your personal information (including sensitive (health) information) will be accessible online via our PACS to your Health Professional, who IRIS Imaging records show is involved in your care (eg to your family doctor or specialist). 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 IRIS Imaging is informed that there is a serious threat to life, health or safety, we may also provide access to other Health Professionals. You may also elect to give express consent to IRIS Imaging providing access to your personal information (including sensitive (health) information) (such as images and reports) to Medical Specialists or hospital medical staff generally.



Complaints

You can complain about how we have treated your personal information or privacy generally. Please send your complaint to the IRIS Imaging Operations Manager. The complaint will be investigated and a response will be sent to you as quickly as possible (generally within 14 days of receipt of the complaint). If you are dissatisfied with the response, you can refer the matter to the Office of the Australian Privacy Commissioner. See <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> for more information.

Your privacy is important to IRIS Imaging.