



Privacy Policy

Introduction

Smart Health Training & Services (ABN 68 525 401 619) (Smart Health) is committed to protecting the privacy of your personal information.

This Privacy Policy explains how and why we collect your personal information, how it is used and disclosed, what controls you have over our use of it, and how to contact us if you have any questions regarding the management of your personal information.

Smart Health is required by the *Privacy Act 1988* (Cth) (Privacy Act) to comply with the Australian Privacy Principles (APP) that regulate how private organisations collect, use, disclose, store, provide access to and destroy personal information. The Privacy Act applies to all organisations that provide a health service, including Allied Health professionals.

What is Personal Information?

Personal information is any information or an opinion, in any form and whether true or not, about an identified individual, or an individual who is reasonably identifiable from the information or opinion collected. Examples include an individual's name, address, contact details, and date of birth.

Provisions apply to the collection of personal information which is defined as sensitive information such as Health Information for use to provide, or in providing a health service. Examples include clinical notes of an individual's symptoms, diagnoses and treatment given, professional reports and test results, appointment and billing details, prescriptions and other pharmaceutical information, and any other information reasonably necessary to provide a health service. Smart Health is committed to only handling the minimum amount of Health Information reasonably necessary to provide the required health service.

Collection of Personal Information

Smart Health will only collect personal information, including sensitive and health information, using fair and lawful means, to deliver products and services to you, to

complete transactions on your behalf and to better understand your requirements and preferences.

Smart Health will only collect personal information where we have your permission to do so or in the circumstance where the collection is authorised and required by law. Smart Health will not collect personal information about you unless that information is necessary for one or more of our products or services.

The provision of personal information is generally relied upon to deliver products and services. If you choose to not provide your personal information to us, we may be limited in the services we are able to offer you and be limited in the way we can interact with you.

Types of Personal Information we may collect

To provide our products and services to you, the types of personal information Smart Health may request or collect include:

- name(s)
- contact details – address, phone number, email
- communication preference
- age or date of birth
- profession, occupation or job title
- next of kin information
- medical history
- health insurance, DVA or insurance claim details
- IP address
- information about when and how you use our website or services
- device and connection information, such as browser, operating system, mobile platform and unique device and other technical identifiers
- URL click stream data, including date and time, and content you viewed or searched for
- details of the services you have accessed or enquired about, together with any additional information necessary to safely and appropriately deliver those services to you and to respond to your enquiries
- any additional information that you provide to us directly through our websites or indirectly through use of our websites or online presence or through our staff
- financial information that is collected via the website to bill for products and services
- information you provide to us through client surveys

We also keep a record of communications and documents that we are required to retain by law.

Use and Disclosure of Personal and Health Information

The personal information you provide to Smart Health will be collected for the primary purpose of providing high quality health services.

Smart Health may use or disclose your personal and/or health information for a range of purposes including:

- the provision of high quality health services and products to you
- the administration of our services, including our accounts and to process payments
- to communicate with you regarding any issues affecting your treatment
- to notify you about any changes to our services
- for our record-keeping following termination of our services to you
- for technical maintenance requirements

If Smart Health uses or discloses your personal and/or health information for a purpose (secondary purpose) other than the main reason for which it was originally collected (primary purpose), to the extent required by the Privacy Act, we will ensure that:

- the secondary purpose is related to the primary purpose (and directly related in the case of sensitive information) and you would reasonably expect that Smart Health would use or disclose your information in that way
- you have consented to the use and disclosure of your personal and/or health information for the secondary purpose
- where we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety
- where we reasonably suspect that unlawful activity has been, is being or may be engaged in and the use or disclosure is a necessary part of our investigation or in reporting the matter to the relevant authorities
- where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process);
- where we reasonably believe that the use or disclosure is necessary for prevention, investigation, prosecution and punishment of crimes or wrongdoings or the preparation for, conduct of, proceedings before any court or tribunal or the

implementation of the orders of a court or tribunal by or on behalf of an enforcement body

- where we are required to disclose the information to the third party in order to facilitate a service such as furniture installation or delivery in the case of workplace assessment recommendation

Where required, personal and/or health information will be disclosed as required or authorised by or under law or as otherwise permitted by the Privacy Act.

When does Smart Health disclose Personal/Health Information to Third Parties?

In performing our functions and activities, we may need to disclose personal and/or health information to third parties. Third parties may include, where appropriate:

- other members of your treatment team where necessary
- other health care professionals, if in our judgement that is necessary in the context of your treatment
- financial institutions for payment processing
- Government and other regulatory bodies such as the Department of Veterans Affairs, Transport Accident bodies and Workers Compensation bodies
- your employer, where required and permissible in relation to a work-related injury

Security and storage

We will take all reasonable steps to store your personal and/or health information securely and protect it from misuse and loss from unauthorized access, modification or disclosure.

All Smart Health staff are required to adhere to privacy and confidentiality policies.

Smart Health will not store any personal and/or health information any longer than needed for any purpose that is permitted by the Privacy Act. Examples include adhering to a policy or to continue to provide any products or services, unless there is a requirement by law or any contractual obligation to retain the information for longer. Information no longer needed for any purpose permitted by the Privacy Act is permanently de-identified or destroyed securely.

Smart Health retains the information you provide to us, including your contact and credit card details to enable us to verify transactions and customer details and to retain adequate

records for legal and accounting purposes. This information is held on secure servers in controlled facilities.

Smart Health utilizes a NAB Transact eCommerce Solution and primarily NAB Transact Direct Post as the payment gateway which complies with PCI DSS compliance requirements.

Access and Correction of your Personal Information and Health Information

Smart Health is committed to and takes reasonable steps to maintain accurate, timely, relevant, complete, and appropriate information about our customers and website users.

Under the Privacy Act you have a right to request access to and correction of your personal and/or health information held by Smart Health. Verification of identity is required with a request to access or update personal information so that we can ensure the security of your personal information and the privacy of others is protected. Inaccurate information will be corrected upon receiving advice from you. An administration fee may be imposed for access to your personal and/or health information.

If we refuse to provide you with access to or correct the personal information held about you by us, we will provide a written response for such refusal.

Smart Health will respond to requests for access or correction within a reasonable time of receipt.

Please contact Smart Health with any requests for access to or updates of your personal and/or health information.

Attn: Business Manager
Smart Health Training & Service Pty Ltd

Archer Building, Level 2 Suite 4, 72 O'Connell Street North Adelaide SA 5006

Phone: (08) 8293 1100

Email: reception@smarthealthtraining.com.au

Complaints

Please contact Smart Health if you have any concerns or complaints regarding this Privacy Policy or the way your personal information has been collected or managed by Smart Health

by either using our online Feedback Form (www.smarthealthtraining.com.au/), email Attn: The Business Manager reception@smarthealthtraining.com.au, or contact the clinic directly on (08) 82931100. For further information please refer to our [Complaints Policy & Process](#).

Cookies

A cookie is a text file that is sent from a web server to your computer's hard disk when you use our website. This information does not personally identify you. It simply tells us what areas of our website your computer has visited. It also tells us that if you have selected a product and put it in your shopping basket, it does not tell us your personal identity unless you are registered with us. Cookies cannot be used to run programs or deliver viruses to your computer.

When you visit the Smart Health website to read, browse or download information, our system will record your IP address (the address which identifies your computer on the internet and which is automatically recognized by our web server), date and time of your visit to our site, the pages viewed and any information downloaded. We may automatically collect non-personal information about you such as the type of Internet browsers you use or the site from which you linked to our website. You cannot be identified from this information, and it is only used for site analysis and to help us offer you improved online service.

Copyrights

Text, photos, and other materials found on this website are the property of Smart Health. Text, photo, and other materials cannot be reproduced without prior written consent from Smart Health. If you have additional questions or a request to use materials, please send your feedback/request to reception@smarthealthtraining.com.au.

Changes to Privacy Policy

If Smart Health decides to or is required to change this Privacy Policy, it will post changes on this Privacy Policy page so that users are always aware of what information is collected, how it is used, and the way in which information may be disclosed.

Acceptance

You accept that your use of this site includes your acceptance of this Privacy Policy and the Terms of Use.