



## Our Privacy Policy

**Notice:** 'We', 'Us', 'Our', refers to Your Smile Dental. 'You' refers to individual patients or customers.

### 1. Introduction

Your privacy and maintaining the confidentiality of Your personal information is important to Us. We are committed to safeguarding Your personal information. This privacy statement explains what information We collect, how information is collected, used and handled, when information may be disclosed to third parties with Your consent, Your rights for requesting access to or amending Your personal information, as well as how You can provide Us with feedback or make a complaint. This document may be amended by Your Smile Dental from time to time.

### 2. Definitions

Consent means Your permission and consent can be express or implied. Express consent can be written (e.g. when You sign a form or send Us correspondence) or verbal (e.g. when You give Us Your permission over the phone or in face-to-face conversations). Your consent will be implied when We can reasonably form a conclusion from our pre-established relationship with You that You have given consent by either taking action or deciding not to take action.

Personal information has the same meaning that it has under the Privacy Act 1988 (Cth), namely information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

### 3. Information We Collect

We will only collect information that is necessary for providing our services to You. We will only collect information that is necessary for the purposes for which it will be used. The amount and type of personal information We collect from You and hold about You will vary depending on whether You are an existing patient or customer of Your Smile Dental, have made enquiries about our products and services and also the extent to which You have used our products and services. If You apply to be, are currently or have in the past been a patient or customer of Your Smile Dental, the personal, or individually identifiable information that We hold about You may include:

- name, address, telephone and email contact details
- personal details such as age and gender
- details of previous dentists You've been a patient of
- Your Medicare number
- records of service contacts such as system notes and voice recordings of telephone conversation You've had with our employees
- census and statistical information for purposes including product development and risk assessment
- financial information (for example, credit card numbers to assist in the administration of payments for dental services)
- details of purchases made and professional services used, including the date and

Sensitive information including:

- medical history
- family medical history
- current health and dental assessment; and
- health insurance details

#### **4. How Information May Be Collected**

*We may collect personal information directly from You in a number of ways, including:*

- *You* choose to provide it directly to *Us* in order for *Us* to provide dental services to *You*
- *You* may complete forms, send *Us* an email, provide information during a visit to Your Smile Dental
- when *You* subscribe to newsletters or other direct marketing materials
- when *You* use our services or purchase goods from *Us*

*We* may also collect information from other third parties if *You* have provided them with consent under their own privacy policies:

- *We* may collect information from third parties such as *Your* health insurance provider or Medicare; or
- *We* may collect information from dentists, dental specialists or other health practitioners (for example if *You* were referred to *Us* by another dentist).

#### **5. Use and disclosure of Your Personal Information**

*We* use *Your* personal information primarily to provide, manage and administer dental services and products to *You* and operate an efficient and sustainable business. *We* may use *Your* personal information for a number of purposes, including:

- to provide dental and related services to *You*;
- to maintain and administer *Your* patient file(s) at Your Smile Dental;
- to contact *You* in relation to any matter relating to *You* or the dental services or products provided to *You*;
- to answer *Your* enquiries and deliver dental services to *You*;
- to carry out internal functions such as administration, accounting, quality assurance and information technology;
- to resolve complaints;
- to monitor price and evaluate products and services;
- to conduct marketing surveys, research and statistical analysis;
- to fulfil marketing promotions;
- to administer *Your* invoicing for dental services, credit card payments, or to collect unpaid invoices;
- to process *Your* health insurance claims;
- to follow *You* up regarding further dental examinations or treatments required;
- to send information to *You* about *Us*;
- to comply with any laws or regulations

*In order to allow Us to manage and administer Our dental services and products to You and to operate an efficient and sustainable business, We may be required to disclose Your information to third parties. This may include disclosure in the following circumstances:*

- to *Your* nominated relatives in an emergency;
- to government and regulatory bodies, eg. Medicare;
- to auditors and other service providers *We* may appoint to ensure the integrity of *Our* operations and services;
- to any person or entity acting on *Our* behalf;

- to dentists, dental specialists and other healthcare professionals, for the purpose of seeking a second opinion or a referral, where You have consented to Us obtaining the second opinion or the referral;
- to third party health benefit providers and insurance companies (contact information only) to assist in the processing of a claim for reimbursement or payment of all or part of the cost of dental treatment submitted by You or on Your behalf;
- to carry out a review of the practice for the purposes of improving the quality of care provided;
- where disclosure is required by law, e.g. compulsory notices from courts of law, tribunals or government agencies.

However, if We do send Your personal information outside of Australia We will require that the recipient of the information complies with privacy laws and contractual obligations to maintain the security of the data.

## 5.2 Direct marketing

From time to time, We may contact You to provide You with information about other products and services offered by Us. When We contact You it may be via mail, phone, email or SMS. When You become our patient, You consent to Us using Your personal information for direct marketing purposes (as described in this document), unless You have contacted Us to withdraw Your consent. If You do not wish to receive marketing material from Us You can contact Us at any time to let Us know. Our contact details are at the end of this policy. When You contact Us to make this request, We will action Your request within 10 working days. If You request not to receive marketing material, please note that We will still contact You in relation to Our on-going relationship with You. For example, We will still send You any bills, statements and notices that are relevant to the products and services You have purchased from Us.

## 6. Handling and storage of Personal Information

We will take reasonable steps to ensure that Your personal information is stored securely and is protected from misuse and loss and from unauthorised access, modification or disclosure. We will take reasonable steps to ensure that personal information provided by You will be handled in accordance with Australian privacy laws including the Australian Privacy Principles. We maintain strict data security standards and procedures with a view to preventing unauthorised access to Your data by anyone other than Us.

Your personal information may be handled by Our employees. Information may be used by staff at Your Smile Dental for the provision of dental services to You. We keep Your personal information for as long as it is required to provide You with the services and products You requested from Us and to comply with legal requirements.

If We no longer require Your personal information for any purpose, including legal purposes, We will take reasonable steps to securely destroy or de-identify Your personal information except in circumstances permitted or required by law.

## 7. Accessing, Amending, Updating and Correcting Your Information

### 7.1 Access to personal information

You have the right to access personal information that is held about You. You can ask Us for access to the information that We hold about You at any time. Simply contact Us (Our contact details are listed below) to make Your request. We will always endeavour to meet Your request for access within a reasonable time and in the manner requested by You if it is reasonable to do so. However in some circumstances, access to certain information may be declined. This includes the following circumstances:

- We no longer hold or Use the information;
- providing access would have an unreasonable impact on the privacy of others;
- the request is frivolous or vexatious;

- the information relates to existing or anticipated legal proceedings and would not normally be disclosed as part of those proceedings;
- providing access would be unlawful;
- denying access is required by law;
- providing access would be likely to prejudice the prevention, detection, investigation and prosecution of possible unlawful activity;
- the information would reveal our commercially sensitive decision-making process;
- where access would pose a threat to the life or health of any individual;

If *We* are unable to give *You* access to the information *You* have requested, *We* will give *You* written reasons for this decision when *We* respond to *Your* request. If *You* have any concerns about the refusal, please see section 9 of this Policy for further information.

*We* may charge *You* a reasonable fee for access to some types of information. This charge will be limited to the cost of recouping *Our* costs for providing *You* with the information. For example, document retrieval, photocopy, labour and delivery to *You*. *We* will not charge *You* to make a request to access *Your* information.

*You* may request access to *Your* personal information by contacting *Us* as per the contact details at the end of this document.

## **7.2 Correcting Your Personal Information**

To enable *Us* to provide *You* with the best possible service, it is important that the information *We* hold about *You* is accurate. *We* will take reasonable steps to ensure that *Your* personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing it. If *You* believe any information *We* hold about *You* is inaccurate, incomplete or out-of-date, *You* should contact *Us* to let *Us* know. *We* will respond to *Your* request within a reasonable period and will take reasonable steps to amend *Your* records.

## **8. Changes to the Privacy Statement**

*We* may change the content or services found on *Our* Website at any time without notice. Consequently *Our* Privacy Statement may change at any time also without notice.

## **9. Our Contact Information and Resolving Your Concerns**

*You* can contact *Us* at any time if *You* have any questions or concerns about this document or about how *Your* personal information has been handled.

*You* can contact *Us* and ask to speak to *Our* Practice Manager.

### **Contact Details**

Telephone: +61 (08) 7999 7750

Address: PO Box 1945, Palmerston NT 0831

Email: [admin@yoursmiledental.com.au](mailto:admin@yoursmiledental.com.au)

If *You* are not happy with *Our* response, or if *You* do not feel *Your* complaint has been resolved, *You* are able to seek advice from the Office of the Australian Information Commissioner by calling 1300 363 992.