

PRIVACY POLICY

We respect your personal information and your privacy is important to us. Newcastle Foot and Ankle Clinic (NFAC) is committed to maintaining the highest standards to protect your personal information.

In order to provide you with the best service we may ask you to provide us with personal information from time to time. This Privacy Policy sets out NFAC practices in relation to the collection, use, disclosure and handling of personal information in Australia.

In this Privacy Policy, all references to “Newcastle Foot and Ankle Clinic”, “we”, “our” and “us” means Newcastle Foot and Ankle Clinic Pty Ltd (ACN 120 739 335).

All information which is held by NFAC is governed by the latest version of this Privacy Policy at all times. NFAC may change this Privacy Policy at any time without notice. We encourage you to check our Privacy Policy regularly so that you are aware of any changes.

Operation of our Policy

You will be made aware when any personal information is required that may allow NFAC to identify or contact you. Personal information will usually be requested when you register for a particular service or purchase goods or services. By consenting, either expressly or impliedly, to NFAC processing your personal information, you will be deemed to have read and accepted the terms of this Privacy Policy. NFAC will not process your personal information, unless it has your consent. Your personal information will only be used by NFAC in accordance with this Privacy Policy. You are free at any time to opt out of receiving marketing communications from NFAC at the end of each communication.

We comply with the law

NFAC is bound by the Privacy Act 1988 in Australia, as amended from time to time. In Australia the Privacy Act does not apply to employee records which are governed by workplace laws.

What personal information does NFAC hold?

The personal information that NFAC may collect and process includes (but is not limited to):

- your full name;
- your contact details (mailing address, street address, email address, phone number and/or mobile number);
- your date of birth;
- your relevant health details including (a) current and past general health and foot conditions, (b) current medication details, and (c) correspondence between your health service provider, your GP or other medical practitioner or relevant third party agents;
- your examination and test results;
- your third party agents who are involved in managing care or payment relating to services associated with NFAC health services;

- details of your visit to the website and any transactions you carry out or forms you fill in on the website;
- your lifestyle, occupation and hobbies;
- your health fund and Medicare details;
- any information or images you give us, where necessary;
- your employer, where necessary;
- details of the services or products you have purchased or enquired about (including any additional information necessary to deliver the product or provide you with the service and respond to your enquiries, including but not limited to your prescription details and medical history); and
- any other information you have voluntarily provided to us.

Some personal information we collect is “sensitive information”. Sensitive information includes health information. Sensitive information will be used and disclosed only for the purpose for which it was provided, or a directly-related secondary purpose, unless you agree otherwise, or where certain other limited circumstances apply (for example, where required by law or necessary for the protection of a person/persons).

How does NFAC collect personal information?

NFAC will collect personal information directly from you unless it is not reasonably practicable to do so. We mainly collect this information from you when you give it to us voluntarily, but we may also collect it from other sources if it is legal to do so. We will only ask you to provide information that is relevant to the service or product that you have requested or to enable us to respond to your enquiry. We may collect personal information from you in various ways including:

- when you visit a NFAC clinic for products and health services;
- when you attend a screening organised by NFAC at a public or industry event or a foot health screening organised by your employer;
- when you visit a NFAC clinic or our website or indirectly through the use of our website or online presences, through our representatives or otherwise;
- when you make a purchase through our website;
- when you book an appointment or make an enquiry over the phone, through our website or other electronic means;
- when you enter our competitions and trade promotions;
- when you register on our website;
- when you provide customer feedback surveys, lodge a complaint and communicate with our Administration Team;

- any information and /or images provided to us; and
- when authorised people provide us with your personal information on your behalf

Your personal information may also be collected on occasions through third parties including:

- from insurance, care and third party agencies;
- from health funds or Government agencies (in order to receive advice about your eligibility to rebates on NFAC product and services);
- from third party practices which have been converted to NFAC;
- from other professionals and health practitioners (with your consent);

Information collected from visitors to our website (including via mobile access)

When you use our website, NFAC may collect information about our website users collectively, which may include data about your location (i.e. city and country), internet browser type, language, operating system, service provider, screen resolution and whether you are visiting for the first time or revisiting our website. This data is anonymously collected and only used in aggregate, and as such no identifying information is collected. NFAC may use this information to help improve our website and its usability and to help us determine what is most beneficial to our users so that we can provide you with the best possible experience.

Our use of cookies

In order to measure the success of our on-line advertising we use pixels, or transparent GIF files, to establish which of our online adverts successfully bring people to our website. The GIF files are provided by third parties who provide us with online advertising analysis. This system places a cookie on your browser when you enter our website via online advertisements allowing us to see which online advertisements bring us the most visitors to our website. The information collected on our behalf is anonymous and does not personally identify you. The information does not contain your name, address, telephone number or your e-mail address. Most web browsers automatically accept cookies, but you can change your browser to reject them. Even without a cookie you can still use our website.

How might NFAC use the personal information they collect?

NFAC may use the personal information collected from you for a number of purposes connected with our business including to:

- book your appointment
- perform examinations so we can understand your foot health and any medical conditions
- provide products and services you have requested;
- process any transactions with your purchase of our goods and services
- process credit and debit card payments via third-party payment card processors;
- respond to your requests or enquiries and other customer care related activities;

- evaluate, developing and enhancing our websites and our services;
- survey and feedback requests to help us improve our service to you
- conduct website and system administration, such as for the technical support of our websites and computer systems;
- undertake direct marketing such as providing information to you about special offers, promotions, products or services that we think may be of interest to you or conducting market research surveys including by mail, email, SMS, social media or other forms of communication. When we send you direct marketing materials about our products and services, you will be able to unsubscribe from them;
- confirm an upcoming appointment;
- advise you of the requirement for further review;
- contact you about changes to our service that could affect or inconvenience you;
- carry out any activity in connection with a legal or regulatory requirement or in connection with legal proceedings;
- carry out activities connected with the running of our business and in connection with the transfer of any part of our business in respect of which you are a customer or potential customer;
- respond to complaints, queries and claims made against us; and
- carry out general administrative and business requirements

If you choose not to provide us with the information we ask for, we may not be able to perform these functions or to provide the requested goods or services.

From time to time we may use the information you give us for marketing purposes (for example to develop or promote complimentary products or services for visitors to our website). We are continually developing products and services based on information and feedback we receive from visitors to our website and we may share these with you. Other than as required by law, or as set out in this Privacy Policy, we will not disclose information about you to any third party without your permission.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

How might NFAC disclose personal information?

There may be times when we need to disclose your personal information to third parties. NFAC shall take such steps as are reasonable in the circumstances to ensure the information is de-identified prior to disclosure. NFAC will only disclose your information, for the purposes set out in this Privacy Policy, to:

- persons to whom we may be required to pass your information by law including regulatory bodies;
- other medical practitioners, health and social care providers who you are associated with;

- other third parties who have a legal right to access personal information, e.g. the police, our insurers, external auditors, investigators;
- other companies who provide us with updated personal information e.g. changes to your contact information;
- persons assisting NFAC to protect and defend the rights of NFAC, the interests and personal safety of users of NFAC or members of the public;
- anyone authorised by the individual to whom the personal information relates to;
- to another company, in the event that NFAC or a related asset or line of business is acquired by or transferred to that other company;

Except as set out in this Privacy Policy, NFAC will only disclose personal information with your permission or as required or allowed to do so by law.

Management and security of personal information

NFAC has security safeguards and procedures in place to ensure that the personal information we collect is stored in a secure environment protected from unauthorised access, modification or disclosure.

Although we take reasonable steps to maintain the security of our internet connections, for reasons outside of our control, information transmitted to us over the internet may not be absolutely secure. NFAC assumes no responsibility for disclosure of data due to errors in transmission.

Whilst we will use our all reasonable endeavours to safeguard your personal information we cannot guarantee that your personal information will be protected against unauthorised access, misuse or disclosure. We do not accept any liability for the improper actions of unauthorised third parties.

We retain your personal information in line with relevant legislation and for as long as the information is relevant to our business purposes as set out above or until you request by formal correspondence that we remove the information by contacting us.

NFAC has procedures in place to ensure that any document or record containing your personal or health information is disposed of in a manner that preserves your privacy.

Disclaimer

We take precautions to protect your personal information collected, but in the event that our system is infiltrated by unauthorised third parties we will not be liable for any resulting misuse of the personal information.

Updating your personal information

NFAC endeavours to ensure that the personal information it holds about individuals is accurate, complete up-to-date and not misleading. Please contact NFAC if the information we hold about you requires changing, or is out of date. If it is reasonable in the circumstances for us to do so, we will make the requested change or correction, otherwise we will take reasonable steps to record the substance of your change or correction request.

Accessing personal information

You will be able to access personal information that NFAC holds about you if it can be readily retrieved, subject to some exceptions allowed by law.

To request access to your personal information please contact NFAC in writing.

To the extent permitted by law NFAC may charge a reasonable administrative fee associated with providing a copy of your personal information to you.

How to contact the Privacy Officer

If you would like to make an enquiry about this Privacy Policy or would like to make a request to access and update your personal information, or you believe that NFAC has not adhered to this Privacy Policy at any time, please contact NFAC in writing and we shall use reasonable endeavours to correct any problem.

Privacy Officer
Newcastle Foot and Ankle Clinic Pty Ltd
PO Box 231

CHARLESTOWN NSW 2290.

Tel: 1800 23 2300

Fax: (02) 4943 4700

Email: admin@foot.net.au

How to make a complaint

If you feel we have failed to deal with your complaint in a satisfactory way you can make a complaint about the handling by NFAC of your personal information to the Office of the Australian Information Commissioner (Australia). For more information about privacy in general please contact the following:

Office of the Australian Information Commissioner (OAIC)
www.oaic.gov.au.

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