

Healius Limited

Privacy Policy

1. Introduction

This Privacy Policy (**Policy**) applies Healius Limited (ACN 064 530 516) and its related bodies corporate (together, **the Healius Group**), including:

- Healius Pathology Pty Ltd (ACN 007 190 043) (**Healius Pathology**);
- Specialist Veterinary Services Pty Ltd (ACN 006 909 173) (**SVS**);

The Healius Group is committed to protecting the confidentiality and privacy of your personal information. This Policy explains how we handle personal information.

Healius Pathology provides pathology services to patients and commercial clients and has a number of trading names around Australia as follows:

- Lavery Pathology in New South Wales and the Australian Capital Territory;
- Dorevitch Pathology in Victoria;
- QML Pathology in Queensland;
- Abbott Pathology in South Australia;
- Western Diagnostic Pathology in Western Australia and the Northern Territory;
- TML Pathology in Tasmania;
- Kossard Dermatopathologists;
- Genomic Diagnostics;
- Gastrolab; and
- IQ Pathology.

SVS trades as Vetnostics and Vetnostics Pathology, and provides veterinary pathology laboratory services to veterinarians, the veterinary service industry and commercial clients.

In conducting our business, we collect, use and disclose personal information. We understand the importance to our patients and other persons we test of maintaining privacy in relation to the personal information we hold.

This Policy sets out how we comply with our obligations under the *Privacy Act 1988* (Cth) and other relevant State and Territory legislation in managing your personal information.

2. What Personal Information Do We Collect and Hold?

Personal information is information or an opinion about an identified person, or someone who is reasonably identifiable, whether or not the information or opinion is true and whether the information or opinion is recorded in a material form or not.

The types of personal information we may collect and hold about you include:

- **Identity:** Used to confirm your identity including your name, address, date of birth, gender, and identification documents.

- **Contact Information:** Used to contact you if required and for identification purposes such as your address, phone number, email address and next of kin/emergency contact details.
- **Health and Insurance Identifiers:** For administrative purposes such as billing and includes your Medicare number and insurance details.
- **Clinical:** Information provided with the request for our services (by your GP for example) and other information we need to provide our services to you such as the tests requested, test results, clinical and clinically-related notes contained in the request form and associated documents, disease status, and correspondence provided by health practitioners involved in your care.
- **Genetic Testing:** We will collect genetic information for genetic testing, and may need to collect information about your ethnicity for certain genetic tests.
- **Requesting Practitioner Information:** The name, practice address and contact details, of the practitioner requesting the service, and Medicare provider number (where relevant).
- **Billing and Financial Information:** This includes credit and debit card numbers and bank account details.
- **CCTV and Other Site Information:** Our sites including laboratories may collect images via CCTV and may use facial recognition software.
- **Online Interactions:** This includes your Internet Protocol (IP) address and also, usually via cookies, or sometimes tags or pixels, information used to maintain user sessions, saving of certain settings and data, and to generate statistics about the number of people that visit our websites. Generally, this information will not identify you and we do not link it back to your identity or other information that you have provided to us.
- **Employment Information:** If you apply for employment with us, or become an employee, we will collect from you information relevant to your application and employment which may include, but is not limited to, the details listed above and also your work history, references, educational history, qualification and training details, health information, criminal record & working with children checks, biometric information and any other information provided by you as part of the application process or employment.

3. How Do We Collect and Hold Personal Information?

We collect personal information about you in several ways, including from:

- information that is recorded on the pathology request form your health practitioner gives you when recommending that you obtain pathology services;
- other persons or entities who ask us to perform pathology services on your behalf (for example, the hospital/nursing home where you are a patient, a government department or your employer);
- someone who has responsibility for you (your parent, carer or guardian);
- you directly (for example where you tell our staff verbally, complete a form, email or message us, or where obtained from a recorded or transcribed telephone interaction);
- law enforcement, Government agencies, solicitors, courts and insurer requests;
- an employer or education body with which you have had dealings;
- in the case of requester health practitioners, from Government data bases and publicly available internet searches.

When we receive a request to provide you with pathology services, we create a unique digital medical record for you. Every time we perform a pathology service for you, new information is added to your medical record.

We take reasonable steps to protect patient medical records from misuse, interference and loss and also from unauthorised access, modification and disclosure. These steps include ensuring that our information technology systems and processes comply with the requirements of the National Pathology Accreditation Advisory Council for information communication.

Healius Pathology is subject to a range of rules relating to the periods for which health information and records must be retained. We must generally retain health information about an individual for the following minimum periods:

- for 7 years from the last occasion on which we provided a health service to the individual – if we collected the information when the individual was 18 years old or older; or
- until the individual turns 25 – if we collected the information when the individual was less than 18 years old.

If you contact us by telephone, your call with us will be recorded for training and quality purposes, may be transcribed by software and may be stored with a third party provider. Please let the operator know if you do not want your call to be recorded.

4. Why Do We Need Your Personal Information

1. Patient Care

We collect, maintain, use and disclose personal information about you in order to provide you with appropriate care, treatment and services.

We use the information in your medical record:

- to ensure that we provide the correct pathology services;
- to interpret your pathology results and to make an appropriate diagnosis;
- to provide you and/or your health practitioner with information that may assist you in managing and improving your health; and
- as a medical history for you as results of pathology services we provide to you are added to your medical record over time. This medical history allows our health professionals to provide you with better care as it assists with identifying changes to your health over time.

We disclose your pathology results:

- to the person who requested the pathology service on your behalf (normally your health practitioner);
- to anyone else specified in the request for the pathology service (your health practitioner may request that we disclose your pathology results directly to you or to other health practitioners who are involved in your treatment);
- to other persons not specifically listed in the request for the pathology service but who claim to be providing health care services to you and we are satisfied that their claim is genuine (we will only do this if we are reasonably satisfied that they are a registered health practitioner, or you have consented to this occurring, or there appear to be other reasons why this is appropriate for your health care);

- where the pathology service was requested on your behalf by your employer or a government department, to that employer or government department;
- to you personally or to anyone else you may request or consent to in writing, provided you supply us with any information we may request from you in order to be reasonably satisfied that the request is genuinely from you (e.g.: certified identification documents); and
- where the pathology service provides a positive result to a notifiable disease (e.g. COVID-19 test), to the relevant government authority.

We may also disclose your complete pathology medical history, including all pathology results for all pathology services we have ever performed for you (regardless of who requested the relevant pathology services), to a registered health practitioner who requests this. We will only do this if we are satisfied as to the identity of the registered health practitioner, and they confirm to us that this is required solely for them to deliver health care personally to you.

For some specific pathology tests (such as full blood counts, electrolytes, liver function tests and other serology and immunology pathology tests), it is accepted clinical practice that we must give your health practitioner not only the test result for the test your health practitioner has requested but also the results of all tests of the same nature that we have performed for you previously (regardless of who requested those tests). Past results assist your health practitioner to determine whether or not your current test result is abnormal.

In some circumstances, it may be necessary for us to obtain confirmatory testing from a third-party laboratory, or for highly specialised or proprietary pathology services we may need to arrange for another laboratory to perform the required pathology services on our behalf. We may also seek a second opinion from expert pathologists outside our organisation. These experts and laboratories may be located in countries other than Australia. In these circumstances, we will disclose personal information about you to these third parties for the limited purpose of obtaining the necessary pathology services.

2. Operating Our Business

We use, and where necessary disclose, your personal information to manage our accounts and obtain payment for the services we provide. Specifically, we will use and, where necessary, disclose your personal information to obtain payment from, as appropriate, Medicare Australia, you, your private health insurance fund or from any organisation responsible for payment of any part of your account, such as the Department of Veterans Affairs. This may also extend to disclosure of your personal information to a debt collector or a credit-checking agency. We also use, and where necessary disclose, your personal information for data entry and data analytics purposes.

If the circumstances require, we may disclose your personal information to our insurers.

We may use your personal information to:

- give you important information about our products and services, including notification of a change of address of sites you have visited;
- advertise to you particular products and services that may be of interest to you; and
- give you reminders in relation to obtaining services from us (for example where your health care needs require regular, periodic pathology services).

3. Teaching and Research

We may use your personal information for internal teaching purposes or to monitor, evaluate, plan and improve the services we provide. This may include sending you surveys to provide feedback to us on our services. We will only use de-identified information (information that does not contain any personal details that may reasonably identify you) for these purposes, unless the service we provide is to you.

Entities undertaking research (such as Cancer Councils, universities and pharmaceutical companies) periodically request data from our medical records. We will only provide identified data in response to these requests when authorised to do so by the *Privacy Act 1988* (Cth).

University students undertaking clinical placements with us may have access to and use your personal information, but only in accordance with this Privacy Policy.

4. Other disclosures

We may be required by law to disclose your personal information without your consent. This includes, but is not limited to, statute-mandated notification of certain diseases, subpoenas or other court or tribunal orders, police warrants and health regulator requirements. Such disclosures will be limited to the extent required to meet the legal obligation.

We may also disclose your personal information to third party service providers who assist us with running our business operations, including IT service providers. We will only do so where appropriate contractual protections are in place.

We may also disclose your personal information as a part of considering an employment application. This will include suitability and reference checks.

5. What Happens If We Do Not Collect Your Personal Information?

If you don't provide us with all the personal information we request, we may not be able to provide pathology services to you. We aim to only collect as much personal information from you as we need to provide you with services and to allow us to obtain payment for those services.

6. Do We Transfer Personal Information Overseas?

We may disclose your personal information to wholly owned subsidiaries of our parent company, Healius Limited, or to third parties, which are based overseas including, but not limited to, the United Kingdom, the European Union including Ireland, the United States, Mexico, Georgia, Israel, India, Malaysia and the Philippines. These companies provide billing, payment and other administrative services, data-entry and data analytics, talent acquisition and IT support services to us. We may disclose personal information as part of a limited range of specialised tests sent to reference laboratories based in the UK, Hong Kong and the USA. We take reasonable steps to ensure that these companies do not breach the requirements of the *Privacy Act 1988* (Cth) and other State and Territory legislation that may be applicable.

7. Artificial Intelligence

We may use AI (including for supporting decisions and data analytics) to process, interpret or match personal information. By way of example: our pathologists may use an AI program to assist in interpreting your results to inform the pathologist's reporting and diagnosis. However, AI is not used to make fully-automated decisions regarding our patients where that deals with their personal information and as there is always appropriate human oversight.

We only use personal information from our patients in AI where it is reasonably necessary to do so, and only on internally approved, non-public, secure AI systems operating within the Healix IT environment, and which complies with privacy laws. AI may assist in initial screening of job applicants and preliminary matching to a role, but again does not make fully-automated decisions.

If your personal information is collected via an AI chatbot or an AI automated tool, you will be informed beforehand and have the option to opt out and provided with alternative options.

8. Can You Access Your Personal Information We Hold?

You may request access to the personal information we hold about you. You can also request that corrections be made to it. We will respond to your request within a reasonable time.

There are some circumstances where we are not required to give you access to or correct your personal information. We will normally give you a written notice setting out our reasons for not complying with your request and informing you of how you can complain about our refusal.

There is no fee for requesting access to your personal information or for us to make corrections. However, we may charge a fee for our costs involved in collating and providing you with access to any personal information. If charged, that fee is payable before access is given.

9. What to Do If You Would Like to Make a Complaint About a Breach of the Australian Privacy Principles

If you have any concerns about how we handle your personal information or you wish to make a complaint on the basis that we have breached the Australian Privacy Principles prescribed by the *Privacy Act 1988* (Cth), or other privacy laws, please contact us. If you would like to make a complaint, you will generally need to send us a written complaint (see details below).

We will endeavour to respond to your complaint within a reasonable time after it is made.

10. How to Contact Us

You can contact our Privacy Officer in the following ways:

Email	privacyofficer@healius.com.au
Post	Attention: Privacy Officer Level 22, 161 Castlereagh Street SYDNEY NSW 2000
Phone	02 7258 4091 or 02 7259 9106

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