

Embrace Medical on Crown Privacy Policy

This privacy policy is to provide information to you, our patient, on how your personal information (which includes your health information) is collected and used within our practice, and the circumstances in which we may share it with third parties.

Who can I contact about this policy

For any questions about this policy or how your information is handled, please contact our Practice Manager at pm@embracemedical.com.au or 02 4288 8807.

Why and when your consent is necessary

When you register as a patient at our practice – through online platforms like AutoMed, at the reception desk or if you have previously received medical services- you provide the consent for our GP's and practice staff to access and use your personal information to deliver the best possible healthcare. Access to your information is limited to staff members who require it for your care. If we need to use your information for any other purpose, we will seek your additional consent beforehand, unless required by law to meet legislative requirements.

Why do we collect, use, hold and share your personal information?

We collect, use store and share your personal information to provide healthcare services to you. This also includes, managing records, billing, and internal quality improvements (audits, accreditation, staff training).

What personal information is collected

The information we will collect about you includes your:

- Name, date of birth, addresses, contact details and associated personal and other demographic details
- Medical information including medical history, medication, allergies, adverse events, immunisations, social history, family history and risk factors
- Medicare number, health identifiers and health fund details

Dealing with us anonymously

You have the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorised by law to only deal with identified individuals.

How do we collect your personal information?

Our practice may collect your personal information in several ways.

- When you make your first appointment our practice staff will collect your personal and demographic information via your registration.
- While providing medical services, we may collect further personal information.
- Information can also be collected through electronic transfer of prescriptions or My Health Record (via Shared Health Summary, Event Summary)
- We may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media.
- In some circumstances personal information may also be collected from other sources. Often this is because it is not practical or reasonable to collect it from you directly. This may include information from:
 - your guardian or responsible person

- other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services
- your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

Electronic communications, telehealth, AI scribes and My Health Record

We use electronic systems to support your care, including practice management software, secure messaging, SMS, email (for limited purposes), telehealth platforms and My Health Record (where applicable) that meet our security requirements.

- **SMS and email:** Used for appointment reminders and non-urgent communication; we will confirm your preferred contact methods and explain any risks of unencrypted email.
- **Telehealth:** Conducted over approved platforms, with clinical notes recorded in your medical record like in-person consultations.

Use of AI scribes: Some of our doctors may use approved AI scribe tools during consultations to generate draft clinical notes from audio of your conversation. These tools help reduce administrative burden while we review and finalise all notes for accuracy before they become part of your medical record.

- Before using an AI scribe, we will inform you how it works (it records audio, processes it into a summary, and we check/edit the output), and seek your verbal consent at the start of each consultation (documented in your record). You can opt out at any time.
- We only use AI scribes from vendors that meet Australian privacy standards. Data is not used to train models without consent, is de-identified where possible, and we confirm storage/processing locations (prioritising Australian servers) and retention periods with the vendor.
- This complies with NSW surveillance device laws (requiring consent for recording private conversations), the Privacy Act 1988 (Australian Privacy Principles), and professional guidance from RACGP and Aphra.

My Health Record (MHR): We participate in My Health Record to improve the continuity and safety of your care, especially for women's health, perinatal care and family medicine where coordination with other providers is key.

- If you have a MHR and have set access controls allowing it, we may view your MHR (e.g. shared health summary, event summary, test results, discharge summaries, prescriptions) and upload information (e.g. Shared Health Summary, event summaries, test results, immunisation history) relevant to your care. All access and uploads are logged and auditable.
- You control your MHR: you can create/cancel it, set access controls (e.g. private notes, sealed sections, access codes), delete items and view an audit log of who accessed your record via myhealthrecord.gov.au. Ask us if you need help managing this.
- We will discuss MHR use with you, obtain your consent for uploads where required, and respect any restrictions you set. If you do not have or do not want to use MHR, we will continue to manage your records within our practice systems.
- Our MHR use complies with the My Health Records Act 2012 (Cth), Privacy Act 1988 and professional standards.

When, why and with whom do we share your personal information?

We sometimes share your personal information:

- with third parties who work with our practice for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with APPs and this policy
- with other healthcare providers
- when it is required or authorised by law (e.g. court subpoenas)
- when it is necessary to lessen or prevent a serious threat to a patient's life, health or safety or public health or safety, or it is impractical to obtain the patient's consent
- to assist in locating a missing person
- to establish, exercise or defend an equitable claim
- for the purpose of confidential dispute resolution process
- when there is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- while providing medical services, through eTP, My Health Record (e.g. via Shared Health Summary, Event Summary).

Only people who need to access your information will be able to do so. Other than providing medical services or as otherwise described in this policy, our practice will not share personal information with any third party without your consent.

We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

Our practice will not use your personal information for marketing any of our goods or services directly to you without your express consent. If you do consent, you may opt out of direct marketing at any time by notifying our practice in writing.

Our practice may use your personal information to improve the quality of the services we offer to our patients through research and analysis of our patient data.

We may provide de-identified data to other organisations to improve population health outcomes. The information is secure, patients cannot be identified, and the information is stored within Australia. You can let our reception staff know if you do not want your information included.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms.

Our practice stores most medical and personal records securely in electronic format, using a cloud-based solution hosted at a data center in Australia that complies with all relevant legal and regulatory requirements.

In some cases, certain data may also be stored locally—either electronically or in hard copy (paper format)—as required to meet specific healthcare needs. All storage locations are accessible only to authorised staff members and medical practitioners of Embrace Medical on Crown's. All staff and medical practitioners are bound by Embrace Medical on Crown's confidentiality agreement.

If you would like more information about our confidentiality agreement, please speak with our reception staff. While we welcome your feedback and encourage you to raise any concerns with the Practice Manager, please note that a copy of the confidentiality agreement cannot be provided to patients.

How can you access and correct your personal information at our practice?

You have the right to access and request correction of your personal information. Our practice recognises and respects this right and is committed to maintaining accurate and up-to-date records.

To request access to your medical records, please submit your request in writing—either by email or by speaking with our reception staff. All requests must be accompanied by valid photo identification to ensure accuracy and protect your privacy. We will respond to your request within 15 business days.

Our practice will take reasonable steps to correct any personal information that is inaccurate or outdated. From time to time, we may also ask you to verify that the information we have on file is current. If you wish to update or correct your details, please contact us in writing at pm@embracemedical.com.au or speak directly with our Practice Manager on 024288 8807.

How can you lodge a privacy-related complaint, and how will the complaint be handled at our practice?

We take all complaints and concerns regarding privacy seriously. If you have any privacy-related concerns, please submit them in writing. We are committed to addressing and resolving such matters in accordance with our internal resolution procedure.

You can lodge your concerns by emailing us at pm@embracemedical.com.au or by speaking directly with our Practice Manager on 024288 8807. We aim to respond to all requests within 15 business days of receipt.

If you are not satisfied with our response, you may also contact the Office of the Australian Information Commissioner (OAIC). Please note that the OAIC generally requires you to allow the practice sufficient time to respond before they initiate an investigation.

For more information, visit www.oaic.gov.au or call the OAIC at 1300 363 992.

Policy review statement

Please note that this privacy policy is reviewed regularly to ensure it remains up to date and compliant with any changes in legislation, regulations, or operational procedures. A copy of the updated Embrace Medical on Crown privacy policy will also be made available upon request.