THE PROSTHODONTIC GROUP

Privacy Policy

How we collect, use, disclose and protect your personal information
The trustee for The Prosthodontic Administration Trust, trading as The Prosthodontic Group | ABN 38 359 320 208
Last updated: 23 November 2026

> Your privacy matters to us. This Privacy Policy explains how The Prosthodontic Group collects, holds, uses and discloses personal information, including health information, and how you can access or correct your information or make a complaint.

1. About this policy

In this policy, "we", "us" and "our" means The trustee for The Prosthodontic Administration Trust, trading as The Prosthodontic Group (ABN 38 359 320 208), which operates specialist prosthodontic practices in Melbourne CBD, Cranbourne and Tullamarine, Victoria, and the website at www.prosgroup.com.au.

We are bound by the *Privacy Act 1988* (Cth), including the Australian Privacy Principles (APPs), and by the *Health Records Act 2001* (Vic), including the Health Privacy Principles (HPPs). This policy applies to patients, prospective patients, referring practitioners, website visitors and anyone else who deals with us.

2. What personal information we collect

The kinds of personal information we collect depend on how you deal with us. It may include:

- **Identity and contact details** — name, date of birth, gender, address, phone number, email address and emergency contact or next of kin.
- **Health information** — medical and dental history, medications, allergies, referral letters, clinical notes, examination findings, X-rays, scans, clinical photographs, impressions and digital models, treatment plans and treatment records.
- **Funding and payment details** — Medicare, Department of Veterans' Affairs and private health insurance details, and billing and payment records.
- **Referrer information** — the name, practice and contact details of your referring dentist, doctor or other health practitioner.
- **Enquiry and communication records** — information you provide when you contact us by phone, email or our website forms, including the Patient Referral and Patient Consultation forms.
- **Website and technical information** — IP address, device and browser type, pages visited and how you interact with our website, collected through cookies and similar technologies (see our Cookie Policy).

Health information is "sensitive information" under the Privacy Act. We only collect it with your consent, or where otherwise permitted or required by law, and only where it is reasonably necessary to provide our services.

3. How we collect personal information

Wherever practicable, we collect personal information directly from you — for example, in person at our clinics, over the phone, by email, or when you complete a form on our website or in our practice.

We may also collect information from third parties, including:

- your referring dentist, doctor or specialist, who may submit a referral to us on your behalf;
- other health practitioners involved in your care, and pathology or radiology providers;
- a parent, guardian or other person authorised to act on your behalf; and
- Medicare, the Department of Veterans' Affairs or your private health insurer.

Anonymity. You may make a general enquiry without identifying yourself or by using a pseudonym. However, it is not practicable for us to assess, treat or bill you without identifying information.

If you do not provide information. If you do not provide the information we request, we may not be able to provide our services to you, process a referral, or claim rebates on your behalf.

4. Why we collect, use and disclose personal information

We collect, hold, use and disclose personal information to:

- assess, diagnose, plan and provide prosthodontic and dental treatment;
- receive and respond to referrals and communicate with your referring practitioner and other practitioners involved in your care;
- manage appointments and send appointment reminders and recall notices;
- issue accounts, process payments and lodge Medicare, DVA and health fund claims;
- respond to enquiries, feedback and complaints;
- manage, improve and administer our practices, including quality assurance, clinical audit, accreditation, staff training and risk management;
- notify our professional indemnity insurers and advisers where required;
- operate, secure and improve our website; and
- comply with our legal and professional obligations.

We use and disclose personal information for the purpose for which it was collected, for a related purpose you would reasonably expect (directly related, for health information), with your consent, or where otherwise permitted or required by law.

Direct marketing

We may send you practice updates or information about our services where you have consented or would reasonably expect to receive them. We will not use your health information for direct marketing without your express consent. You can opt out at any time by using the unsubscribe link in a message or by contacting us.

5. Who we disclose personal information to

Depending on the circumstances, we may disclose personal information to:

- your referring practitioner, general practitioner and other health practitioners involved in your care;
- dental laboratories and technicians who fabricate crowns, bridges, dentures, implant restorations and other prostheses for your treatment;
- pathology, radiology and imaging providers;
- Medicare, the Department of Veterans' Affairs and private health insurers;
- service providers who support our practices, such as practice management and clinical software providers, IT and cloud hosting providers, our website host and form providers, email and telephone

providers, payment processors and our marketing and website agency;
- our professional advisers and professional indemnity insurers;
- a person you have authorised to act on your behalf; and
- courts, regulators, government agencies and others where we are required or authorised by law.

We require our service providers to handle personal information securely and only for the purposes for which we engage them. **We do not sell personal information.**

6. Our website, online forms and advertising

Online forms. Our Patient Referral and Patient Consultation forms are provided through a third-party form service (Jotform). Information submitted through these forms is sent to the clinic location selected on the form. Please only include the information needed for your referral or enquiry, and contact us by phone if you would prefer not to send clinical details online.

Hosting and analytics. Our website is hosted by a third-party website platform (Webflow). We may use analytics tools, such as Google Analytics, to understand how visitors use our website. This information is generally aggregated and does not directly identify you.

Advertising. We may use advertising tools provided by Google and Meta (Facebook and Instagram) to show our ads to people who have visited our website and to measure how effective our advertising is. We do not provide your health information or the content of our referral or consultation forms to advertising platforms.

Cookies. For details of the cookies we use and how to manage your cookie settings, see our Cookie Policy.

Links. Our website may contain links to other websites. We are not responsible for the privacy practices of those websites.

7. Disclosure of information overseas

Some of our service providers, including providers of website hosting, online forms, email, cloud storage, analytics and advertising services, may store or process personal information outside Australia. These countries are likely to include the United States and may include other countries where those providers or their data centres are located.

Where we disclose personal information overseas, we take reasonable steps to ensure the recipient handles it in a way that is consistent with the APPs and, where relevant, the HPPs.

8. How we hold and protect personal information

We hold personal information in electronic records, including in secure practice management and clinical systems and cloud-based services, and in paper records where necessary. We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure, including:

- restricting access to personal information to staff and service providers who need it;
- using password protection, access controls and secure systems;
- keeping paper records in secure areas; and
- requiring staff to keep patient information confidential.

Retention. We keep health records for the periods required by law. Under the *Health Records Act 2001* (Vic), this is generally at least seven years after the last occasion on which we provided a health service to you or,

if information was collected while you were under 18, until you turn 25. When personal information is no longer needed, we take reasonable steps to destroy it securely or de-identify it.

Data breaches. If a data breach is likely to result in serious harm, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as required by the Notifiable Data Breaches scheme.

9. Accessing and correcting your information

You may request access to the personal information we hold about you, including your health records, and ask us to correct information that is inaccurate, out of date, incomplete, irrelevant or misleading.

- Please make your request in writing to our Privacy Officer (contact details below). We may need to verify your identity before we respond.
- We will respond within a reasonable period, generally within 30 days.
- There is no fee to make a request or to ask for a correction. We may charge a reasonable fee for providing access (for example, copying records or images), which will not exceed any maximum fee set by law. We will tell you about any fee before we proceed.
- If we refuse access or correction, we will tell you why in writing, as permitted by law, and how you can complain.

10. Automated decision-making

We do not use computer programs to make decisions, or to do things substantially and directly related to making decisions, that could reasonably be expected to significantly affect your rights or interests. Decisions about your assessment and treatment are made by our clinicians. If this changes, we will update this policy.

11. Making a complaint

If you have a concern about how we have handled your personal information, please contact our Privacy Officer in writing. We will acknowledge your complaint promptly, investigate it and aim to respond within 30 days.

If you are not satisfied with our response, you may contact:

Office of the Australian Information Commissioner (OAIC)

Phone: 1300 363 992

Website: www.oaic.gov.au

Post: GPO Box 5288, Sydney NSW 2001

Health Complaints Commissioner (Victoria)

Phone: 1300 582 113

Website: hcc.vic.gov.au

Address: Level 26, 570 Bourke Street, Melbourne VIC 3000

12. Contact us

For privacy questions, requests or complaints, please contact:

Privacy Officer — The Prosthodontic Group

Post: Level 8, 24 Collins Street, Melbourne VIC 3000

Email: info@prosgroup.com.au

Phone: (03) 9654 5788

Website: www.prosgroup.com.au

13. Changes to this policy

We may update this Privacy Policy from time to time to reflect changes to our practices or the law. The current version will be available on our website and on request. This policy is available free of charge, and we can provide it in another form on request.