

PRIVACY POLICY

Effective and last reviewed: 2 August 2026

1 INTRODUCTION

- 1.1 This Privacy Policy provides information about how your personal information, including sensitive information and health information, is collected, held, used and disclosed within our practice, Elmore Vale Medical Centre (HTET & TIN COMPANY PTY LTD ACN 666 805 956 AS TRUSTEE FOR ELMORE VALE MEDICAL CENTRE TRUST), and the circumstances in which it may be shared with third parties.
- 1.2 Our practice manages personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), the Health Records and Information Privacy Act 2002 (NSW), the Health Privacy Principles (HPPs), and other applicable laws and professional obligations.

2 WHY AND HOW YOUR CONSENT IS NECESSARY

- 2.1 When you register as a patient of a practitioner who consults from our practice, you provide consent for us, including our employees, agents, contractors and other representatives, to access and use your personal information so the independent practitioners consulting from our practice can provide you with appropriate healthcare. Only people who need to access your information will be permitted to do so. If we need to use your information for another purpose, we will seek additional consent where required by law.
- 2.2 When an optional AI-assisted technology is used in a way that requires consent, we will explain its purpose and obtain consent before proceeding. A patient may decline the optional use of an AI scribe without affecting the healthcare provided. A caller may request assistance from a practice team member; an immediate transfer may not always be available, and a callback or another arrangement may be offered in accordance with staff availability and the practice's normal call-handling procedures.

3 WHY DO WE COLLECT, USE, HOLD AND SHARE YOUR PERSONAL INFORMATION

- 3.1 Our practice collects personal information to facilitate the provision of healthcare services by the independent practitioners consulting from our practice. Our main purpose is to facilitate the management of your health. We also use information for directly related activities, including appointment and communication management, financial claims and payments, practice audits and accreditation, quality improvement, staff training and business administration.
- 3.2 Your practitioner, or our practice on your practitioner's behalf, will confirm your identity before conducting a telehealth or remote consultation. These consultations are not routinely recorded or duplicated. Any discussion during a consultation is documented in your electronic patient file. Your practitioner will obtain informed consent before any real-time audio or visual recording, duplication or storage of a consultation.
- 3.3 We use AI-assisted technologies only where reasonably necessary for a legitimate practice or healthcare function, with appropriate privacy safeguards and human oversight. AI-assisted tools do not replace the professional judgement of a healthcare practitioner or the responsibility of practice staff.

4 WHAT PERSONAL INFORMATION DO WE COLLECT

- 4.1 The information we may collect about you includes:
 - (a) your name, date of birth, address, contact details, emergency contact and next of kin;
 - (b) demographic information, including gender, cultural background and religious beliefs;
 - (c) medical information, including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors;
 - (d) Medicare number, where available, for identification and claiming purposes;

- (e) healthcare identifiers;
- (f) payment and financial information;
- (g) concession card details;
- (h) health fund details;
- (i) appointment, enquiry and communication details, including messages and the reason for contacting the practice;
- (j) telephone call metadata and, where disclosed and enabled, call audio, transcripts, call summaries, appointment records, administrative tasks and system logs; and
- (k) records of consent, preferences, corrections, escalations and AI-generated drafts or summaries that are reviewed and retained as part of practice administration or your health record.

5 DEALING WITH US ANONYMOUSLY

- 5.1 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 deal only with identified individuals.
- 5.2 Medicare rebates are available only where a Medicare card and associated information are provided. Your practitioner may therefore require payment in full without a Medicare rebate if you choose to deal with us anonymously or under a pseudonym.

6 HOW DO WE COLLECT YOUR PERSONAL INFORMATION

- 6.1 Our practice may collect your personal information in several ways:
 - (a) You may provide personal information directly, for example when you register, make an appointment or communicate with the practice.
 - (b) Independent practitioners providing medical services may collect further personal information from you and disclose it to us. Information may also be collected through My Health Record, including a Shared Health Summary, Event Summary or a discharge summary provided by a hospital or another healthcare provider.
 - (c) We may collect personal information when you contact us through our website, by email or SMS, by telephone, through an AI-assisted receptionist, through an online appointment service or through social media.
 - (d) In some circumstances, personal information may be collected from another source because it is not practical or reasonable to collect it directly from you. This may include information from:
 - i your guardian or responsible person;
 - ii other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services, pathology providers and diagnostic imaging services; and/or
 - iii your health fund, Medicare or the Department of Veterans' Affairs, as necessary.
- 6.2 If your practitioner considers it in your best interests to discuss clinical information with you, we will arrange for this to occur in person, by telephone or by videoconference.
- 6.3 **AI-assisted receptionist**
 - (a) When you telephone the practice, or when the practice makes an authorised outbound call, you may interact with an AI-assisted receptionist provided by AI technology service provider (e.g Care GP or similar). The AI-assisted receptionist may answer inbound calls, make authorised outbound calls, assist with routine administrative enquiries, manage appointments including booking and rescheduling where enabled, take messages, and refer matters outside its configured functions or requiring staff attention to the practice reception team.

- (b) The service operates using clinic-approved scripts, configured workflows and guardrails. It may collect and process information provided during a call, including your name, date of birth, contact details, appointment information, reason for calling, responses, messages and other information reasonably needed to deal with the enquiry. Because the reason for calling may relate to your health, this information may include sensitive health information.
- (c) Depending on the service configuration, the AI-assisted receptionist may process speech in real time, convert speech to text, and create a transcript, call summary, appointment entry, administrative task or system log. At or before collecting personal information, the opening call notice will identify that the caller is interacting with an AI-assisted service and will explain whether audio is recorded or retained and any other information reasonably required by law. Consent will be requested where required by law or by the selected service configuration.
- (d) The AI-assisted receptionist is not a healthcare professional and does not provide medical advice, diagnose conditions, prescribe treatment or make independent clinical decisions. It is not an emergency service. In a medical emergency, callers must hang up and call 000. Where a request is outside the service's configured functions or requires staff attention, the service is intended to refer the matter or create a message or task for the practice team in accordance with clinic-approved scripts and procedures.
- (e) Practice staff remain responsible for reviewing and actioning messages, appointment requests, referrals, escalations and other outputs where human review is required. A caller may request assistance from a practice team member; an immediate transfer may not always be available, and a callback or another arrangement may be offered.

6.4 AI scribe technology

- (a) Some independent practitioners consulting from the practice may use an approved AI scribe to assist in preparing draft clinical notes, summaries or correspondence.
- (b) The practitioner will explain the technology and obtain your consent at the beginning of the consultation before using it. You may decline without affecting the healthcare provided to you.
- (c) The practitioner remains responsible for reviewing, correcting and approving all AI-generated content before it is entered into the medical record or used for clinical purposes.

7 WHEN, WHY AND WITH WHOM DO WE USE AND SHARE YOUR PERSONAL INFORMATION

7.1 We collect, use and disclose personal information to facilitate the provision of medical services to patients of the independent practitioners consulting from our practice.

7.2 We may also use or share your personal information:

- (a) with other healthcare providers;
- (b) when required or authorised by law, including in response to a court subpoena or a mandatory notification obligation;
- (c) when necessary to lessen or prevent a serious threat to a person's life, health or safety, or to public health or safety, where it is impracticable to obtain consent;
- (d) to assist in locating a missing person;
- (e) to establish, exercise or defend a legal or equitable claim;
- (f) for confidential dispute resolution;
- (g) during the provision of nursing support services;
- (h) for uploading information to My Health Record, including a Shared Health Summary or Event Summary;
- (i) with third parties that work with our practice for business purposes, such as accreditation agencies and information technology providers, where those parties are required to comply with applicable privacy and security obligations; and/or

- (j) with contracted providers that supply telephone, AI-assisted reception, transcription, messaging, appointment-management, clinical documentation or cloud services on behalf of the practice, subject to appropriate contractual, confidentiality, privacy and information-security requirements.

- 7.3 Only people who need to access your information will be able to do so. Except in the course of facilitating healthcare or as otherwise described in this policy, we will not share personal information with a third party without consent or another lawful basis.
- 7.4 We may disclose personal information to recipients outside Australia only where permitted by law. At the date of this policy, the current Care GP provider documentation states that personal information is stored on secure servers in Australia, although limited access from outside Australia may occur where necessary for service delivery, operational needs or legal compliance. If an approved technology provider or subprocessor processes information overseas, we will take reasonable steps to ensure that the information is handled consistently with the APPs and applicable health privacy obligations. Where practicable, relevant overseas locations will be identified in a collection notice, call notice or provider-specific information supplied to you.
- 7.5 Our practice will not use your personal information for direct marketing without your express consent. If you consent, you may opt out at any time by notifying the practice in writing.
- 7.6 We do not authorise contracted AI providers to use identifiable patient information for their own advertising or to train general-purpose AI models unless the practice has separately assessed and approved that purpose, provided appropriate notice and obtained any consent required by law.
- 7.7 A contracted provider may use information that has been appropriately de-identified or aggregated for security, analytics, service improvement or model improvement where this is permitted by contract and law. De-identification must be appropriate to the circumstances, and the information must not reasonably identify an individual patient.

8 HOW DO WE STORE AND PROTECT YOUR INFORMATION

- 8.1 Your personal information may be stored by the practice in various forms.
- 8.2 Information may be stored as electronic records, including through approved cloud-based services, visual records such as photographs, archived paper records, and, where applicable, telephone audio, transcripts, call summaries and system logs.
- 8.3 We take reasonable steps to store personal information securely. Safeguards include passwords, access controls, multi-factor authentication where available, encrypted backups, confidentiality agreements, staff training, secure cabinets, logging and monitoring, and contractual controls for service providers.
- 8.4 Health information is retained in accordance with applicable NSW requirements. Health information collected while a person is an adult is generally retained for at least seven years from the last occasion on which a health service was provided. Health information collected while a person was under 18 is generally retained until the person reaches 25 years of age. Other records are retained in accordance with applicable legal obligations and the practice's retention schedule.
- 8.5 We take reasonable steps to destroy or permanently de-identify information that is no longer required. We keep records of deletion, disposal or transfer where required by law.
- 8.6 Our server and information-security arrangements are designed to protect information against unauthorised access, loss, misuse, interference, modification or disclosure. Measures include:
 - (a) antivirus and endpoint-security software that is updated regularly;
 - (b) firewalls configured to restrict unauthorised traffic;
 - (c) network segmentation and other technical controls where appropriate;
 - (d) access restricted to authorised users according to their roles;
 - (e) physical security for servers, devices and paper records;
 - (f) regular security patching and maintenance; and
 - (g) regular onsite and offsite backups and tested recovery procedures.

- 8.7 Where an AI-assisted call creates audio, a transcript, a summary, an appointment record, an administrative task or a system log, the information will be retained only for as long as reasonably necessary for the stated purpose and in accordance with the practice's approved service configuration, contractual arrangements, legal obligations and retention schedule. Callers will be informed at or before collection if audio is recorded or retained. Information incorporated into a patient health record will be retained in accordance with clause 8.4.
- 8.8 Before implementing or materially changing an AI-assisted service, the practice will assess the provider's privacy, security, hosting, subprocessor, retention, deletion, model-training, human-oversight and breach-response arrangements. The practice will conduct ongoing reviews and, where appropriate, a privacy impact assessment. If the provider or service configuration materially changes, we will update the relevant collection notice or this policy as appropriate.

9 HOW CAN YOU ACCESS AND CORRECT YOUR PERSONAL INFORMATION AT OUR PRACTICE

- 9.1 You have the right to request access to, and correction of, your personal information, subject to applicable law.
- 9.2 You may request access to your medical records by email to reception@evmc.au or by post to Elmore Vale Medical Centre, 10/137 Croudace Road, Elmore Vale NSW 2287. We will respond within a reasonable time, usually within ten business days, subject to the timeframes and exceptions allowed by law. We may provide information by post or, at your request and where appropriate, by secure electronic communication. We may charge reasonable costs incurred in processing an access request, where permitted.
- 9.3 We take reasonable steps to ensure personal information is accurate, up to date, complete and relevant. You may request correction or updating of information by writing to reception@evmc.au. There is no fee for requesting a correction. Where AI-generated content is inaccurate, you may also ask us to correct the relevant personal information or record.

10 HOW CAN YOU LODGE A PRIVACY-RELATED COMPLAINT, AND HOW WILL THE COMPLAINT BE HANDLED AT OUR PRACTICE

- 10.1 We take privacy complaints and concerns seriously. You should express any concern about our handling of personal or health information in writing.
- 10.2 Complaints should be addressed to:

Name and position	Practice Manager
Postal address	Elmore Vale Medical Centre 10/137 Croudace Road Elmore Vale NSW 2287
Email	practicemanager@evmc.au or reception@evmc.au

- 10.3 We will acknowledge your complaint within five business days and aim to provide a substantive response within thirty business days.
- 10.4 You may also contact the Office of the Australian Information Commissioner at www.oaic.gov.au or on 1300 363 992. Concerns about health information handled by a NSW private health service provider may also be raised with the Information and Privacy Commission NSW at www.ipc.nsw.gov.au. These bodies may ask you to allow the practice time to respond before they investigate.

11 PRIVACY AND OUR WEBSITE

- 11.1 If you like, follow or comment on our social media pages, we may receive your social media name and information you choose to make available.
- 11.2 Our website may use cookies. A cookie is a small file stored by your browser that assists with website settings and delivery of content. We may collect information such as device type, browser type, IP address and pages accessed. You can control cookies through your browser settings, although this may affect access to some website content.
- 11.3 Our website may contain links to third-party websites. We are not responsible for the content or privacy practices of those websites.
- 11.4 The website may provide information about AI-assisted services used by the practice. Any public-facing AI tool introduced through the website will be clearly identified as AI and will provide an appropriate collection notice before collecting personal information.

12 PRIVACY STATEMENT REVIEW

- 12.1 This Privacy Policy will be reviewed at least annually and whenever there is a material change to the way the practice handles personal information, including a material change to an AI-assisted service or technology provider.
- 12.2 Last reviewed: 02/08/2026
- 12.3 Next scheduled review: 02/08/2027