



Privacy Policy

BUAC Health Pty Ltd (ACN: 608 458 322)

- **Merewether Podiatry**
 - **New Lambton Podiatry**
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1. Purpose and Scope

- 1.1 BUAC Health Pty Ltd is committed to providing quality services to you. BUAC Health Pty Ltd respects your privacy and is committed to protecting your privacy. We understand the importance you attach to information that identifies you (your 'personal information') and we want to ensure we help you protect it.
- 1.2 BUAC Health Pty Ltd are bound by and committed to supporting, the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs). This Privacy Policy explains how we handle information that we learn about you when you submit any personal information to us or our associated entities in person, by mail or email or by visiting our websites.
- 1.3 By consenting (expressed or implied) to BUAC Health Pty Ltd processing your personal information, you will be deemed to have read and accepted the terms of this policy. The Privacy Policy is subject to change at any time without notice. All modifications are effective immediately. We encourage you to review our Privacy Policy periodically.

2. What is personal information and why do we collect it

- 2.1 "Personal information" means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly. Examples of personal information we collect include:
 - Names
 - Addresses
 - Email address
 - Phone number
 - Facsimile .
- 2.2. We collect your personal information for the primary purpose of providing our services to you, providing information to our patients, and marketing. We may also use your personal information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from mailing/marketing lists at any time by contacting us in writing.
- 2.3 When we collect personal information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

3. How do we collect personal information from you?

- 3.1 We will only collect personal information which you have voluntarily provided to us or consented to us collecting the information. We may collect personal information about you in a variety of ways, for example:
 - When you visit or use our websites;
 - When you retain our services;
 - When you contact us or our associated entities, for example by mail, email or telephone;
 - When you apply for employment with us; and
 - From third party entities, such as law enforcement agencies and other government or regulatory bodies.

4. What personal information do we collect?

4.1 The personal information we collect about you depends on the nature of your dealings with us or what you choose to share with us.

The personal information we collect about you may include, but is not limited to:

- Full Name
- Contact details (address, email address, phone number/s)
- Date of birth
- Relevant health information including current and past health and foot conditions, current medications, allergies, correspondence between relevant medical professionals and third parties
- Treatments provided and results from ant testing conducted
- Imaging results
- Any other information voluntarily provided to us

5. Sensitive Information

5.1 Under certain circumstances, BUAC Health Pty Ltd may need to collect sensitive information about you. Sensitive information is defined in the *Privacy Act* to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, sexual preferences, criminal record, or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law

5.2 If we collect your sensitive information, we will do so only with your consent, if it is necessary to prevent a serious or imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.

5.3 You do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with your personal information, we may not be able to provide you with our services or interact with you.

6. How do we collect your personal information

6.1.1 BUAC Health Pty Ltd will collect information directly from you unless it is not reasonably practicable to do so. Information collected from you is voluntary. We may also collect information from other sources if it is legal to do so. We will only request information that is relevant to the service or product that you have requested. Ways we may collect information from you may include, but is not limited to:

- When you visit our clinic for appointments or to purchase products
- When you visit our websites
- When you book an appointment or make an enquiry over the phone, through the websites, or via email
- Completing forms (online and paper forms)
- Referrals sent from other medical professionals
- Any information and/or test results or imaging provided to us;

- From authorised individuals on your behalf.

7. Accuracy and correction

- 7.1 To enable us to keep our records properly, please notify us if you believe that any information we hold about you is inaccurate, incomplete or out of date and we will take reasonable steps, in the circumstances, to ensure that it is corrected.

8. How do we disclose your personal information?

- 8.1 Your personal information will only be disclosed to those employees or consultants of BUAC Health Pty Ltd related to the agreed provision of services. Depending on the nature of the engagement, we may need to disclose your personal information to third parties which may include service and providers (for example medical practitioners, specialist referrals).
- 8.2.1 BUAC Health Pty Ltd shall not knowingly provide personal information to any third party for any other purpose without your prior consent unless ordered to do so by a law enforcement body, court of law or other governmental or regulatory body or agency.
- 8.2.2 BUAC Health Pty Ltd may store, process or back-up your personal information on computer systems and software that are located overseas (including through third party service providers). The privacy laws in other countries might not be the same as in Australia. However, where BUAC Health Pty Ltd provides your personal information to third parties overseas, the Company will take such steps as are reasonable to ensure that your information is handled and stored in accordance with Australian privacy laws and this Policy.
- 8.3 Where reasonable and practicable to do so, we will collect your personal information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

9. Access to your personal information

- 9.1 You can request us to provide you with access to personal information we hold about you by contacting our clinics.
- 9.2 We may allow an inspection of your personal information in person, or provide copies or a summary of relevant documents, depending on what is the most appropriate in the circumstances. Your request to access your personal information will be dealt with in a reasonable time.
- 9.3 Note that we need not provide access to personal information if a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonable interference with another person's privacy, or be a breach of the law. If we refuse access, we will provide you with reasons for doing so.
- 9.4 To protect your personal information, we require identification from you before releasing the requested information.

10. How do we use your personal information

- 10.1 BUAC Health Pty Ltd may use personal information collected for many purposes including, but not limited to:
- Securing and confirming appropriate appointments
 - Conducting examinations and treatments to ensure we have a detailed understanding of your overall foot health

- Advise of products that may be suitable
- Maintain detailed records of all services provided including results obtained from additional testing performed including imaging
- Quality and improvement of products and services we offer
- Promotional emails regarding products, services, and special offers
- Perform activities connected to the day to day running of our business

10.2 If you choose to withhold your personal information, we may not be able to perform our service to the best of our ability.

11. Security and retention of personal information

- 11.1 BUAC Pty Ltd takes your privacy very seriously. We will take reasonable steps in the circumstances to protect any personal information you provide to us from misuse, interference or loss and unauthorised access, modification and disclosure.
- 11.2 Please be aware that the transmission of data is never guaranteed to be completely secure. It is possible that third parties not under the control of BUAC Health Pty Ltd may be able to access or intercept transmissions or private communications without the Company's permission or knowledge. BUAC Health Pty Ltd takes all reasonable steps, to protect your personal information. However, we cannot ensure or warrant the security of any information you transmit to us. Such transmissions are done at your own risk. Our security procedures are reviewed from time to time and we update them when relevant.
- 11.3 When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information. However, most of the personal information is or will be stored in client files which will be kept by us for a minimum of 7 years.

12. Data breach notification

- 12.1 Under the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth), BUAC Health Pty Ltd is required to give notice to the Office of the Australian Information Commissioner (OAIC) and affected individuals of an “eligible data breach”. This means that if we hold personal information about you, and there is unauthorised access to or disclosure of your personal information, and if you, as the “affected individual” would be likely to suffer serious harm from this access or disclosure, we must notify both you and the OAIC.
- 12.2 “Serious harm” could include identity theft, threats to physical safety, economic and financial harm, harm to reputation, embarrassment, discrimination or harassment. The test is whether a “reasonable person” would expect you to suffer serious harm.
- 12.3 If you are likely to suffer serious harm from a data breach, we will notify you of:
- the nature of the eligible data breach (i.e. how the information was accessed or disclosed);
 - the type of information that was accessed or disclosed;
 - the steps that we have taken to control or reduce the harm, and those that we plan to take;
 - any assistance we can offer you;
 - anything that we can suggest you can do to assist yourself or mitigate the harm;
 - whether the breach has also been notified to the OAIC;

- how you can contact us for information or to complain.

12.4 We will notify you using the same method that we usually use to communicate with you. If it is not practicable for us to notify you personally, we will publish the notification on our websites.

12.5 There are some circumstances in which we do not have to notify you of a data breach. These include:

- where we have taken remedial action before any serious harm has been caused by the breach;
- if you have been notified of the breach by another entity;
- if notification would be inconsistent with Commonwealth secrecy laws; or
- where the OAIC declares that notification does not have to be given.

12.6 Depending on the nature of the breach and the harm, we will also consider informing other third parties such as the police or other regulators or professional bodies.

13. Online Activity

13.1 Cookies

13.1.1 The BUAC Health Pty Ltd websites uses cookies. A cookie is a small file that asks permission to be placed on your computer's hard drive. These cookies recognise when your device has visited our websites before, so we can distinguish you from other users of the websites. Cookies allow Web applications to tailor its operations to your needs by gathering and remembering information about your preferences. This improves your experience and BUAC Health Pty Ltd websites.

13.1.2 We use traffic log cookies to identify which pages are being used which then helps us to analyse data and improve our websites based on consumer needs. This information is only used for analysis purposes and then the data is removed from the system.

13.1.3 We do not use cookies to identify you, just to improve your experience on our websites. If you do not wish to use cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our websites's functionality may be affected.

13.2 Websites Analytics

13.2.1 Our websites uses various analytical services to help us better understand visitor traffic, so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances we may connect with you.

13.3 Marketing

13.3.1 We may send you direct marketing communications and information about our services that we consider may be of interest to you if you have requested or consented to receive such communications. These communications may be sent in various form, including mail, SMS, fax, and email, in accordance with applicable marketing laws, such as the *Australian Spam Act 2003* (Cth). You consent to us sending you those marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

13.3.2 You may opt-out of receiving marketing communications from us at any time by unsubscribing or contacting us writing.

13.3.3 In addition, we may also use your personal information or disclose your personal information to third parties for the purposes of advertising, including online behavioural advertising, websites personalisation, and to provide targeted, or retargeted advertising content to you (including through third party websites).

14. Links to third party sites

14.1 BUAC Health Pty Ltd websites may provide links to other sites for you to access. You should be aware that these other sites are not subject to this Privacy Policy or our privacy standards and procedures. You will need to contact them directly to ascertain their privacy standards

15. Changes to our Privacy Policy

15.1 This information relates to our current Privacy Policy. From time to time, we may vary this policy for any reason. We will publish any changes on these websites.

15.2 By continuing to use our websites and continuing to provide us with your information, you confirm your acceptance of these changes. This Privacy Policy was last amended in September 2024.

16. Complaints resolution

16.1 BUAC Health Pty Ltd is committed to providing a fair and responsible system for the handling of complaints from parties whose personal information we hold. For complaints about how BUAC Health Pty Ltd handles, processes, or manages your personal information, please contact the Practice Manager. We will address any concerns you have through our complaints handling process and we will inform you of the outcome of your complaint within a reasonable timeframe.

16.2 If after receiving our response, you still consider that your privacy complaint has not been resolved, you may refer your concerns to the Office of the Australian Information Commissioner at www.oaic.gov.au

17. How to contact us

Email:	admin@merewetherpodiatry.com.au
Phone:	(02) 4963 3206
Mail:	ATTN: Practice Manager 6 Allworth Street Merewether NSW 2291

18. Disclaimer

18.1 When using the a BUAC Health Pty Ltd websites, you signify your understanding and agreement to comply with all terms and conditions and confirm your acceptance of the terms of this Privacy Policy and consent to the use of your personal information as set out in this Privacy Policy.

18.2 If you do not agree with the terms of this Privacy Policy, please do not use the websites or otherwise provide us with your personal information.



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Document control

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