

ORTHOMOTION PRIVACY POLICY

Table of Contents

Table of Contents	1
1. Introduction.....	2
2. Definitions.....	2
3. Your consent.....	2
4. Collection, use, holding and sharing your personal information	2
5. Personal information we collect	2
6. Dealing with us anonymously	3
7. Collecting your personal information.....	3
8. Sharing your personal information.....	3
9. Storage and protection of your personal information	4
10. Personal information access requests and corrections.....	5
11. Lodging a privacy-related complaint.....	5
11.1 Office of the Australian Information Commissioner.....	5
12. Privacy and our website.....	6
13. Version control	6

1. Introduction

The Orthomotion privacy policy provides information to our clients on how their personal information (which includes health information) is collected and used within our practice and the circumstances in which we may share it with third parties.

2. Definitions

The terms 'you' and 'your' in this document refer to a client of Orthomotion.

The terms 'our', 'we' and 'us' in this document refer to Orthomotion as a clinical practice and the staff employed by Orthomotion.

3. Your consent

You provide consent for Orthomotion to access and use your personal information via the *Privacy Notice* section of the *Orthomotion New Client Application & Client Referral* online application form when you request orthotic services from Orthomotion. Only staff who need to see your personal information will have access to it. If we need to use your information for anything else, we will seek additional consent from you to do this.

4. Collection, use, holding and sharing your personal information

Our practice will need to collect your personal information to provide healthcare services to you. Our main purpose for collecting, using, holding and sharing your personal information is to manage your health. We also use it for directly related business activities, such as financial claims and payments, practice audits and accreditation, and business processes.

5. Personal information we collect

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- third party insurance/funding details including for NDIS (participant details including funding plan dates, goals and funding), icare, EnableNSW, Home Care Package
- photographs and video footage taken before, after and during the provision of orthotic services to you
- clinical health records
- specialist reports and test results
- your appointment and billing details

- your signed agreements to recommended orthotic services

6. Dealing with us anonymously

Under the Privacy Act 1988 (Cth) 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.

7. Collecting your personal information

Orthomotion may collect your personal information in the following ways:

1. when you make an initial enquiry about our services via the Orthomotion website online enquiry form or via email or phone call to our practice staff
2. when you complete the *Orthomotion New Client Application and Client Referral* application and the *Orthomotion New Client Service Agreement* online forms
3. when you schedule your first appointment our practice staff via phone and/or email to complete new client processes
4. through the provision of clinical supports and services to you
5. when you visit our website, send us an email or SMS, telephone us

Personal information may also be collected from other sources when 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 third party funding organisation (ie. NDIS, icare, EnableNSW, Home Care Package provider)

8. Sharing your personal information

We will sometimes share your personal information as follows:

- with other healthcare providers
- 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
- when it is required or authorised by law (eg 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

- for the purpose of confidential dispute resolution process
- when there is a statutory requirement to share certain personal information (eg public health mandatory notification)

Orthomotion will not share your personal information with any third party without consent other than in the provision of clinical orthotic services and supports to you or as otherwise described in this policy.

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 via email to office@orthomotion.com.au.

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

9. Storage and protection of your personal information

Orthomotion is an electronic medical records practice and we do not retain hard copies of your medical or personal information.

We store all records electronically in a secure, encrypted hosted service maintained by a professional IT service provider. We securely destroy any paper copies of personal information immediately after recording the data in our records management systems.

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

- electronic records (emails; scans; reports; online forms; clinical notes)
- visual records (video footage; cast scans; photos)
- physical cast moulds (prior to being configured, scanned then securely destroyed)

All electronic personal information is protected from unauthorised access, misuse, interference, loss, modification or disclosure through the following processes and procedures:

- **secure location**: the Orthomotion clinic is located within a security building with only authorised access available by specific staff provided with security access (alarm code and key)
- **staff training**: all Orthomotion staff are trained on their privacy obligations and requirements in performing their role
- **IT management services**: our IT services and systems are Australian-based and incorporate business-specific anti-virus, anti-spam and back-up systems to protect personal data and prevent data breaches

- **Spam protection:** staff are trained on email spam awareness to minimise the risk of unauthorised access to our systems

10. Personal information access requests and corrections

You have the right to request access to, and correction of, your personal information.

Orthomotion acknowledges that our clients may request access to their medical records. We require you to put this request in writing via email to office@orthomotion.com.au and our practice will respond to you within 21 days.

The fees associated with a request for personal information relate to the total time taken by Orthomotion to comply with the request and will be calculated at the current (pro-rated) hourly clinical rate at the time of the request.

Orthomotion will take reasonable steps to correct your personal information where the information is not accurate or up to date. From time to time, we will ask you to verify that your personal information held by our practice is correct and current.

You may also request that we correct or update your information and you should make such requests in writing to office@orthomotion.com.au.

11. Lodging a privacy-related complaint

We take complaints and concerns regarding privacy seriously. You can advise Orthomotion of any privacy concerns you may have in writing, via email, directly to the Orthomotion Operations Director at operations@orthomotion.com.au or phone Orthomotion on (02) 9055 5300 or make an online complaint via our Feedback Form located on our [website](#).

You also have the option of making an anonymous complaint to us where practical for us to respond and resolve.

We aim to resolve any client-related privacy concerns within **30 business days**.

We aim attempt to resolve any concern in accordance with our complaints management and resolution procedures. We will communicate the outcome to you in writing, via email, and invite a response to our conclusion about the complaint. We will assess any responses received from you and advise of any changes from our initial conclusion.

11.1 Office of the Australian Information Commissioner

You may also refer your complaint to the Office of the Australian Information Commissioner (OAIC) if you are unsatisfied with Orthomotion's response to your privacy-related complaint or wish to seek further advice. You can contact the OAIC via their website at www.oaic.gov.au or phoning 1300 363 992 or sending an email to enquiries@oaic.gov.au.

12. Privacy and our website

Refer to our website terms and conditions at www.orthomotion.com.au for information on accessing and using our website in relation to privacy of information.

13. Version control

Current Version:	Creation date:	Review cycle:	Review date:
Version 1	19 October 2022	Two years	October 2024
Version 2	8 February 2024	Two years	February 2026