

Privacy Policy

1 Policy statement

St Vincent's Hospital Sydney Limited with respect to its facilities St Vincent's Hospital Sydney, Sacred Heart Health Service and St Joseph's Hospital (**St Vincent's Health Network**) is committed to protecting the privacy of the personal information and sensitive information which it collects and holds.

St Vincent's Health Network must comply with the Australian Privacy Principles under the *Privacy Act 1988* (Cth), and other privacy laws (including the *Health Records and Information Privacy Act 2002* (NSW) and the *Privacy and Personal Information Protection Act 1998* (NSW) which govern the way in which organisations (such as St Vincent's Health Network) hold, use and disclose personal information (including your sensitive information). As an affiliated health organisation under the *Health Services Act* (NSW) 1997, St Vincent's Health Network is also subject to the Privacy Manual – NSW Health (Version 2) as amended or replaced from time to time.

The purpose of this Privacy Policy is to explain:

- (a) the kinds of information that St Vincent's Health Network may collect about you and how that information is held;
- (b) how St Vincent's Health Network collects and holds personal information;
- (c) the purposes for which St Vincent's Health Network collects, holds, uses and discloses personal information;
- (d) how you can access the personal information St Vincent's Health Network holds about you and seek to correct such information; and
- (e) the way in which you can complain about a breach of your privacy and how St Vincent's Health Network will handle that complaint.

2 Definitions

In this Privacy Policy the following terms have the following meanings:

health information is:

- (a) personal information or an opinion about:
 - (i) an individual's physical or mental health or disability (at any time);
 - (ii) an individual's express wishes about the future provision of health services for themselves; or
 - (iii) a health service provided, or to be provided, to an individual;
- (b) other personal information collected to provide, or in providing, a health service;
- (c) other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- (d) genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (e) whether the information or opinion is true or not; and
- (f) whether the information or opinion is recorded in a material form or not;

sensitive information means:

- (a) personal information or opinion about an individual's:
 - (i) racial or ethnic origins;
 - (ii) political opinions or political associations;
 - (iii) philosophical beliefs or religious beliefs or affiliations;
 - (iv) sexual preferences or practices; or
 - (v) criminal record; or
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information.

3 Collection and use of personal information

3.1 Types of personal information collected by St Vincent's Health Network

- (a) Patients/residents/clients/research participants

St Vincent's Health Network collects information from you which is necessary to provide you with health care services or to enable you to participate in research studies. This includes collecting personal information such as your name, address and contact details, your health history, family history, past and current treatments lifestyle factors, and any other information which is necessary to assist the health care team in providing appropriate care, or our research team in conducting its research.

- (b) VMOs, students, contractors and volunteers

St Vincent's Health Network collects information from you which is necessary to properly manage and operate its business. This includes collecting personal information such as your name, address and contact details, professional experience, qualifications and past employers, and any other information which may be necessary appropriately conduct its business.

- (c) Job applicants

St Vincent's Health Network collects information from you which is necessary to assess and engage job applicants. This includes collecting personal information such as your name, address and contact details, professional experience, qualifications, references and past employers, and any other information which is necessary to process your job application.

- (d) Donors

Where you have consented, St Vincent's Health Network collects information from you for the purposes of fundraising and managing donations. This includes collecting personal information such as your name and address and any other information required to process your donation.

3.2 How we collect personal information

We will usually collect your personal information directly from you, however sometimes we may need to collect information about you from third parties, such as:

- (a) relatives;
- (b) another health service provider;
- (c) past employers and referees;
- (d) related entities (being those listed in the annexure).

We will only collect information from third parties where:

- (e) you have consented to such collection;
- (f) such collection is necessary to enable us to provide you with appropriate health care services (such as in the case of a emergency medical treatment);
- (g) such collection is reasonably necessary to enable us to appropriately manage and conduct our business (such as in assessing applications for accreditation from VMOs); or
- (h) it is legally permissible for us to do.

St Vincent's Health Network will only collect information which is necessary to provide you with health care services or appropriately manage and conduct our business.

3.3 How St Vincent's Health Network uses your personal information

St Vincent's Health Network only uses your personal information for the purpose for which it was collected by St Vincent's Health Network (**primary purpose**), unless:

- (a) there is another purpose (**secondary purpose**) and that secondary purpose is directly related to the primary purpose, and you would reasonably expect, or St Vincent's Health Network has informed you, that your information will be used for that secondary purpose;
- (b) you have given your consent for your personal information to be used for a secondary purpose; or
- (c) St Vincent's Health Network is required or authorised by law to use your personal information for a secondary purpose (including for research and quality improvements within St Vincent's Health Network).

For example, St Vincent's Health Network may use your personal information to:

- (d) provide health care services to you;
- (e) provide any ongoing health related services to you;
- (f) appropriately manage our business, such as assessing insurance requirements, conducting audits, and undertaking accreditation processes;
- (g) assist it in running our hospital business, including quality assurance programs, billing, improving its services, implementing appropriate security measures, conducting research and training personnel;
- (h) effectively communicate with third parties, including the NSW Ministry of Health, Medicare Australia, private health insurers and Department of Veterans' Affairs; and
- (i) carry out fundraising activities (where you have consented).

3.4 Complete and accurate details

Where possible and practicable, you will have the option to deal with St Vincent's Health Network on an anonymous basis or by using a pseudonym. However, if the personal information you provide us is incomplete or inaccurate, or you withhold personal information, we may not be able to provide the services or support to you are seeking, or deal with you effectively.

3.5 CCTV

St Vincent's Health Network uses camera surveillance systems (commonly referred to as CCTV) for the purposes of maintaining safety and security of its patients, personnel, visitors and other attendees. Those CCTV systems may also collect and store personal information and St Vincent's Health Network will comply with all privacy legislation in respect of any such information.

4 Disclosing your personal information

4.1 Disclosure of your personal information

St Vincent's Health Network will confine its disclosure of your personal information to the primary purpose for which that information has been collected, or for a related secondary purpose. This includes when disclosure is necessary to provide services to you, assist us in running our organisation, or for security reasons.

We may provide your personal information to:

- (a) third parties involved in your care, such as:
 - (i) pathologists and radiologists who have been asked to undertake diagnostic testing;
 - (ii) senior medical experts and specialists who have been asked to assist in diagnosis or treatment;
 - (iii) other health professionals involved in an individual's further treatment (such as physiotherapists and occupational therapists);
- (b) general practitioners (for example, by providing discharge summaries);
- (c) government agencies, such as Defence or Department of Veterans Affairs, where an individual is receiving services with St Vincent's Health Network under arrangements with those agencies;
- (d) government departments responsible for health, aged care and disability where St Vincent's Health Network is required to do so;
- (e) relatives, close friends, guardians (unless St Vincent's Health Network have been told otherwise);
- (f) third parties contracted to provide services to St Vincent's Health Network, such as entities contracted to assist in accreditation or survey processes;
- (g) chaplains associated with St Vincent's Health Network so that an individual may receive pastoral care during admission;
- (h) any of the related entities listed in the annexure;
- (i) research institutions and sponsors with which St Vincent's Health Network's collaborates;
- (j) private health insurance providers and Medicare Australia;
- (k) Fundraising institutions associated with St Vincent's Health Network including St Vincent's Curran Foundation where you have consented to your information being disclosed for fundraising purposes;

- (l) anyone authorised by you to receive your personal information (your consent may be express or implied);
- (m) anyone St Vincent's Health Network is required by law to disclose your personal information to which may include the police, NSW Ombudsman, Privacy Commissioner and the State Coroner.

4.2 Disclosure to External Service Providers

Where permissible under the privacy laws we may disclose personal information to external service providers who may use, process and store that information overseas. For example we utilise an Australian service provider to provide a digital dictation service and that service provider locates its servers in the United States of America.

5 Data storage, quality and security

5.1 Data quality

St Vincent's Health Network will take reasonable steps to ensure that your personal information which is collected, used or disclosed is accurate, complete and up to date.

5.2 Storage

All personal information held by St Vincent's Health Network is stored securely in either hard copy or electronic form.

5.3 Data security

St Vincent's Health Network strives to ensure the security, integrity and privacy of personal information, and will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. St Vincent's Health Network reviews and updates (where necessary) its security measures in light of current technologies.

5.4 Online transfer of information

While St Vincent's Health Network does all it can to protect the privacy of your personal information, no data transfer over the internet is 100% secure. When you share your personal information with St Vincent's Health Network via an online process, it is at your own risk.

There are ways you can help maintain the privacy of your personal information, including:

- (a) always closing your browser when you have finished your user session;
- (b) always ensuring others cannot access your personal information and emails if you use a public computer; and
- (c) never disclosing your user name and password to third parties.

6 Use of cookies

A 'cookie' is a small data file placed on your machine or device which lets St Vincent's Health Network identify and interact more effectively with your computer.

Cookies which are industry standard and are used by most web sites, including those operated by St Vincent's Health Network, can facilitate a user's ongoing access to and use of a site. They allow St Vincent's Health Network to customise our website to the needs of our users. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. However, cookies may be necessary to provide you with some features of our on-line services via the St Vincent's Health Network website.

7 Links to other sites

St Vincent's Health Network may provide links to third party websites. These linked sites may not be under our control and St Vincent's Health Network is not responsible for the content or privacy practices employed by those websites. Before disclosing your personal information on any other website, we recommend that you carefully read the terms and conditions of use and privacy statement of the relevant website.

8 Accessing and amending your personal information

You have a right to access your personal information which St Vincent's Health Network holds about you. If you make a request to access your personal information, we will ask you to verify your identity and specify the information you require.

You can also request an amendment to any of your personal information if you consider that it contains inaccurate information.

You can contact St Vincent's Health Network about any privacy issues as follows:

The Privacy Officer
St Vincent's Health Network
02) 8382 1111 (Hospital switchboard)
02) 8382 2250 (Executive Unit)

While St Vincent's Health Network aims to meet all requests for access to personal information, in a small number of cases and where permitted to do so by law, St Vincent's Health Network may not give access or may do so only under conditions.

Subject to applicable laws, St Vincent's Health Network may destroy records containing personal information when the record is no longer required by St Vincent's Health Network.

9 Complaints

If you have a complaint about St Vincent's Health Network's information handling practices or consider we have breached your privacy, you can lodge a complaint with:

- (a) The Privacy Officer, on the contact details listed in clause 8 above; or
- (b) the Office of Australian Information Commissioner.

St Vincent's Health Network deals with all complaints in a fair and efficient manner.

Annexure – related entities

- (a) St Vincent's Health Australia Limited
- (b) St Vincent's Healthcare Limited
- (c) St Vincent's Health & Aged Care Limited
- (d) St Vincent's Hospital Toowoomba Limited
- (e) The Holy Spirit Northside Private Hospital Limited
- (f) St Vincent's Hospital (Melbourne) Limited
- (g) St Vincent's Private Hospital Melbourne Limited
- (h) St Vincent's Private Hospital Sydney
- (i) The Trustees of the Sisters of Charity of Australia
- (j) St Vincents & Mater Health Sydney Limited
- (k) St Vincent's Hospital
- (l) St Vincent's Clinic
- (m) St Joseph's Village Limited
- (n) Trustees of Mary Aikenhead Ministries