

Privacy policy

General

K.S. Farmer & M.A. Tod Dental Pty Ltd ACN 010 423 784 trading as Ethos Orthodontics (referred to in this document as **we, us** or **our**) recognises that your privacy is very important and we are committed to protecting the personal information we collect from you. The *Privacy Act 1988* (Cth) (**Privacy Act**), and the Australian Privacy Principles (**APPs**) govern the way in which we must manage your personal information and this policy sets out how we collect, use, disclose and otherwise manage personal information about you.

Our separate credit reporting policy (available at <https://ethosorthodontics.com.au/wp-content/uploads/Credit-Reporting-Policy-Ethos-Orthodontics.pdf>) sets out how we collect, use, disclose and otherwise manage your credit-related information.

Collection

Types of information collected

We may collect and hold personal information about you (that is, information that can identify you) and is relevant to our functions and activities. The kinds of information we typically collect depends on our relationship with you. For all individuals we deal with, we may collect your name and other information relevant to providing you with the services you are, or someone else you know is, seeking.

If you are a patient: we will also collect your date of birth, personal and emergency contact information, health and medical information, health fund and payment details.

If you are a parent or guardian of a patient: we will also collect your personal contact information, health fund and payment details.

If you are an employee: we will also collect your date of birth, personal and emergency contact information, tax file number, superannuation details, bank account details, employment history and training details.

If you are a contractor or supplier: we will also collect your personal and business contact details, ABN, and payment details.

Except as otherwise permitted by law, we only collect sensitive information about you if you consent to the collection of the information and if it is reasonably necessary for the performance of our functions and activities. Consent may be implied by the circumstances existing at the time of collection. There may also be circumstances under which we may collect sensitive information without your consent, as required or authorised by law.

Method of collection

Personal information will generally be collected directly from you through the use of any of our standard forms, over the internet, via email, through a telephone conversation with you or in person. We may also collect personal information about you from third parties acting on your behalf.

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

Purpose of collection

The personal information that we collect and hold about you, depends on your interaction with us. Generally, we will collect, use and hold your personal information if it is reasonably necessary for or directly related to the performance of our functions and activities and for the purposes of:

- (a) providing information and services to you or someone else on your behalf;
- (b) responding to your enquiries;
- (c) facilitating our internal business operations, including:
 - (i) establishing our relationship with you;
 - (ii) maintaining and managing our relationship with you and communicating with you in the ordinary course of that relationship (including responding to feedback or complaints);
 - (iii) the fulfilment of any legal requirements; and
 - (iv) analysing our business operations, services and customer needs with a view to developing new or improved business operations or services; and
- (d) providing you with information about other services that we and other organisations that we have affiliations with, offer that may be of interest to you. You may unsubscribe from our mailing/marketing lists at any time by using the unsubscribe feature on any emails we send, or otherwise by contacting us in writing.

Failure to provide information

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else you know, with the services you, or they, are seeking.

Internet users

If you access our website, we may collect additional personal information about you in the form of your IP address and domain name.

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively.

Use and disclosure

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- (a) our employees, volunteers, contractors and consultants (**workers**), and other parties who require the information to assist us with facilitating our internal business processes, providing you with information and services, and with establishing, maintaining, managing, or ending our relationship with you;

- (b) *if you are a patient, or a parent or guardian of a patient:* referring dentists and doctors, other health professionals to whom a further referral of the patient is to be made, and health fund providers;
- (c) *if you are an employee:* the Australian Taxation Office, and your superannuation fund;
- (d) third party service providers who assist us in operating our business and providing you with information and services (including payment processors, insurers, IT and technology service providers, and professional advisers such as lawyers, accountants, and auditors) and these service providers may not be required to comply with our privacy policy;
- (e) third parties to whom you have agreed we may disclose your information (for example, your emergency contacts) or where the information was collected from you (or from a third party on your behalf) for the purposes of passing it on to the third party; and
- (f) any other entity as otherwise permitted or required by law.

We may expand or reduce our business and this may involve the sale and/or transfer of control of all or part of our business. Personal information, where it is relevant to any part of the business for sale and/or transfer, may be disclosed to a proposed new owner or newly controlling entity for their due diligence purposes, and upon completion of a sale or transfer, will be transferred to the new owner or newly controlling party to be used for the purposes for which it was provided.

Sensitive information (including health information) is only used and disclosed for the purposes for which it was collected, unless your further consent is obtained or otherwise as permitted or required by law.

Disclosure of personal information overseas

We are not likely to disclose personal information about you overseas.

Security

We store your personal information in different ways, including in paper and in electronic form. The security of your personal information is important to us. We take all reasonable measures to ensure that your personal information is stored safely to protect it from interference, misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

Access and correction

You may access the personal information we hold about you, upon making a written request. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making the request for access).

We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will give you a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

Complaints and feedback

If you wish to make a complaint about a breach of the Privacy Act, the APPs or a privacy code that applies to us, please contact us using the details below and we will take reasonable steps to investigate the complaint and respond to you.

If after this process you are not satisfied with our response, you can submit a complaint to the Office of the Information Commissioner. To lodge a complaint, visit the 'Complaints' section of the Information Commissioner's website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Information Commissioner's office.

If you have any queries or concerns about our privacy policy or the way we handle your personal information, please contact our privacy officer at:

Street address: 1929 Logan Road, Upper Mount Gravatt QLD 4122

Email address: info@ethosorthodontics.com.au

Telephone: (07) 3349 5266

Website: <https://ethosorthodontics.com.au/>

For more information about privacy in general, you can visit the Office of the Information Commissioner's website at www.oaic.gov.au.