

Privacy Policy

1 Policy statement

Cabrini Health Limited (ABN 33 370 684 005), Cabrini Property Limited (ABN 24 624 981 326) and Cabrini Australia Limited (ABN 42 624 828 306) and their related bodies corporate (**Cabrini, We, Us**) are committed to protecting the privacy of the personal information and sensitive information which We collect and hold. Cabrini provides healthcare and related services across Australia.

Cabrini must comply with the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*, and other privacy laws (including the *Health Records Act 2001 (Vic)*) (**privacy laws**) which govern the way in which We hold, use and disclose personal information (including your sensitive information).

The purpose of this Privacy Policy is to explain:

- (a) the kinds of information that Cabrini may collect about you and how that information is held;
- (b) how Cabrini collects and holds personal information;
- (c) the purposes for which Cabrini collects, holds, uses and discloses personal information;
- (d) how you can access the personal information Cabrini 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 Cabrini will handle that complaint.

Please refer to the specific privacy policies for Cabrini Technology Group, Cabrini Outreach, and Cabrini Foundation.

2 Definitions

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

health information is:

- (a) personal information or an opinion about:
 - (i) the health, including an illness, disability or injury, (at any time) of an individual;
 - (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 to an individual;
- (c) other personal information collected in connection with the donation, or intended donation, by an 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:

- (a) whether the information or opinion is true or not; and
- (b) 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) membership of a professional or trade association or union;
 - (v) sexual preferences or practices; or
 - (vi) criminal record; or
- (b) health information about an individual;
- (c) genetic information about an individual that is not otherwise health information; or
- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

3 Collection and use of personal information

3.1 Types of personal information collected by Cabrinini

- (a) Patients/clients/research participants

Cabrinini 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, the name and contact details of your general practitioner (**GP**), your medical history and other health information, family history, financial information and health fund coverage, information on your emergency contacts 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.

- (a) Medical practitioners, students, contractors and volunteers

Cabrini 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, emergency contact, vaccination and health information and any other information which may be necessary to appropriately conduct its business.

- (b) Job applicants

Cabrini 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.

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; and
- (d) related entities.

We will only collect information from third parties where:

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

Cabrini will only collect information which is necessary to provide you with health care services or to appropriately manage and conduct our business.

3.3 How Cabrini uses your personal information

Cabrini only uses your personal information for the purpose for which it was collected by Cabrini (**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 Cabrini 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) Cabrini is required or authorised by law to use your personal information for a secondary purpose (including for research and quality improvements within Cabrini).

For example, Cabrini may use your personal information to:

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

If you have applied for a position with Cabrini, we may exchange some or all of your personal information with your referees, police, Centrelink and recruitment consultants, for appropriate purposes relating to considering your application including checking your criminal record where permitted by law.

3.4 Complete and accurate details

Where possible and practicable, you will have the option to deal with Cabrini 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

Cabrini 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 Cabrini will comply with all privacy legislation in respect of any such information.

4 Disclosing your personal information

4.1 Disclosure of your personal information

Cabrini 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; and
 - (iii) other health providers involved in your ongoing care (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 Cabrini under arrangements with those agencies;
- (d) government departments responsible for health and disability where Cabrini is required to do so;
- (e) guardians;
- (f) your next of kin or the person you nominate;
- (g) third parties contracted to provide services to Cabrini, such as entities contracted to assist in accreditation or survey processes;
- (h) chaplains associated with Cabrini so that an individual may receive pastoral care during admission;
- (i) research institutions and sponsors with which Cabrini collaborates;
- (j) private health insurance providers and Medicare Australia;
- (k) fundraising institutions associated with Cabrini including the Cabrini 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); and

- (m) anyone Cabrini is required or permitted by law to disclose your personal information to which may include the police, 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.

5 Data storage, quality and security

5.1 Data quality

Cabrini 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 Cabrini is stored securely in either hard copy or electronic form.

Patient personal information that is captured and stored electronically by Cabrini staff is stored on our centralised, onsite computer systems or on secure cloud-based servers. Only authorised staff have access to these systems, which are used to help manage the care of patients. This access is stored and monitored in accordance with Cabrini's policies and procedures.

5.3 Data security

Cabrini 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. Cabrini reviews and updates (where necessary) its security measures in light of current technologies.

5.4 Online transfer of information

While Cabrini 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 Cabrini 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 Cabrini identify and interact more effectively with your computer.

Cookies which are industry standard and are used by most web sites, including those operated by Cabrini, can facilitate a user's ongoing access to and use of a site. They allow

Cabrini 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 Cabrini website.

7 Links to other sites

Cabrini may provide links to third party websites. These linked sites may not be under our control and Cabrini 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 Cabrini holds about you. If you make a request to access your personal information, you will need to:

- (a) make a written application to the Privacy Officer; or
- (b) complete the Request for Access to Information form available at www.cabrini.com.au. We will ask you to verify your identity and specify the information you require. A fee may be charged for this service.

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

You can contact Cabrini about any privacy issues as follows:

The Privacy Officer
Cabrini
privacy@cabrini.com.au
(03) 9508 1776

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

Subject to applicable laws, Cabrini may destroy records containing personal information when the record is no longer required by Cabrini.

9 Complaints

If you have a complaint about Cabrini 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;
- (b) the Cabrini Customer Relations Manager at (03) 9508 1661 or crm@cabrini.com.au;
- (c) the Health Complaints Commissioner at 1300 582 113 or www.hcc.vic.gov.au/contact; or
- (d) the Office of Australian Information Commissioner at 1300 363 992 or enquiries@oaic.gov.au.

Cabrini deals with all complaints in a fair and efficient manner.

10 General

Cabrini reserves the right to amend this privacy policy at any time by publishing the amended policy on its website.

If you do not consent to Cabrini collecting, using or disclosing your personal information, Cabrini may be unable to provide its services to you.

11 Breach

Cabrini takes breaches of this policy seriously. Any breaches by staff, volunteers, officers, contractors, or representatives will be investigated and dealt with through Cabrini's relevant disciplinary procedures.

12 Evaluation and review

Evaluation of this policy will be conducted by assessing the content of complaints and feedback received from individuals in relation to this policy and Cabrini's privacy practices.

This Privacy Policy will be reviewed every two years, or as needed, and presented to the Cabrini Executive for consideration and approval. Material amendments proposed at any time must be approved by the Executive. Non-material amendments to the policy may be approved by the Group Director, Health Funds and Patient Services.

13 References and associated documents

- [Data Breach Response Plan](#)
- Patient's rights and responsibilities brochure
- [Application for Access to Health Information](#)
- [Application for Correction of Health Information](#)
- [Access to and release of Health Information Policy and Procedure](#)

14 Key legislation

- Privacy Act 1988 (Cth)
- Health Records Act 2001 (Vic)