

# Privacy Policy



Primary & Community Care Services Ltd (PCCS) is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cwth) and relevant state and territory privacy legislation.

## What kinds of personal information does PCCS collect and hold?

The personal information that PCCS collects could include a person's name, age, date of birth, gender, the organisation worked for, home address, telephone and fax numbers, and email address/es.

### Health professionals

For health professionals, PCCS may also collect the following details:

- Occupation
- Membership of professional associations
- Provider and/or prescriber number
- Professional interests and/or the nature of the practice, and
- Dealings with PCCS.

These details are collected in order to:

- Provide appropriate services
- Conduct research and evaluation programs, or
- Report participation to bodies managing the educational, continuous professional development or quality improvement programs in which health professionals participate.

### Members of the Public

PCCS may also collect information from members of the public concerning:

- Areas of interest in order to provide members of the public with relevant information, and
- Services or information PCCS provides or are provided to members of the public on PCCS' behalf.

### Suppliers

PCCS may also collect information about PCCS's suppliers or those who provide services to or on behalf of PCCS, such as the nature of the products and services provided, quotes provided and direct credit details.

### Sensitive information

Where PCCS is providing or coordinating a health service for or on behalf of a client, PCCS may collect sensitive information—such as information about the client's health and information about personal attributes such as ethnic or racial origin—when it relates to the provision of the service or its evaluation.

PCCS will only collect this information with a client's consent or otherwise in accordance with the National Privacy Principles and relevant privacy legislation.

## How does PCCS collect and hold personal information?

### On provision of information to PCCS

PCCS primarily collects information about a person/organisation/health professional/supplier when they use or request a PCCS product or service, complete a survey, questionnaire or enrolment form or when they communicate with PCCS by email, telephone, in writing or in person.

PCCS also collects information on a person if they are providing services to PCCS or on application for employment at PCCS, through the staff recruitment and selection process.

### From publicly available sources

PCCS also collects personal information from the public domain, for example from professional registration boards.

### Indirect collection

PCCS tries to collect personal information about an individual only from that individual, but in some circumstances PCCS may obtain personal information from a third party, such as a general practice manager, a health professional, a family member, friend or carer. If personal information about another person is provided to PCCS, we require that the person is informed.

### From the PCCS website

When visiting the PCCS website, PCCS' web server may download a cookie to your computer. A cookie is a small piece of information sent by our server to your browser.

Cookies do not contain personal information about users. However, cookies can identify a user's browser. The cookies transferred by the PCCS website are used for such things as capturing information about a user's web browser or enabling login access to password protected areas of the website.

The PCCS website may also identify your location, using Location Based Services. These services allow us to identify a location, which allows PCCS to provide you with services and information, for example the location of a doctor near to you. If you do not want information collected through the use of Location Based Services, most devices have a mechanism that will allow these services to be switched off.

### Protection and security

PCCS manages personal information in accordance with this policy and privacy legislation.

PCCS maintains security of personal information by restricting access to only those staff and service providers with a legitimate need to access it. Security measures are in place to prevent the misuse, unauthorised access, modification or disclosure of personal information.

PCCS has archiving policies and procedures, which provide for the destruction or de-identification of records of personal information when they no longer required, in accordance with Australian Privacy Principle 11.2.

Data collected for research purposes is stored and disposed of in accordance with National Health and Medical Research Council guidelines.

## For what purposes does PCCS collect, hold, use and disclose personal information?

Personal information is collected, held, used and disclosed by PCCS in accordance with the Privacy Act and the Australian Privacy Principles to:

- provide information to health professionals and consumers
- provide and/or coordinate health services for PCCS clients
- assist PCCS to develop programs and services and profile the users of those programs and services
- conduct evaluations of PCCS materials, programs and services
- assist in PCCS conducting research (either alone or with other organisations)
- record and monitor the participation in and use of educational materials and products by health professionals
- report continuing professional development points and/or participation in practice incentive activities where relevant
- promote educational activities including events and conferences
- contact individuals for feedback on PCCS's materials, programs and services, and
- assist PCCS to perform its corporate and contractual obligations.

PCCS may also disclose personal information in circumstances where it has statutory obligations or is otherwise required to do so by law or in the case of an emergency.

PCCS does not supply, sell or rent the personal information it collects to unrelated third parties for the purpose of marketing those third parties' products or services.

De-identified information (which will not identify someone) may be used by PCCS or provided or sold to third parties for the purposes of research and marketing.

## How you may access personal information about yourself that is held by PCCS and seek the correction of such information

At any time you can advise PCCS of changes to your personal information or ask to be removed from our mailing lists by contacting us at our address below.

You have the right to ask for access to the personal information held about you and to advise of any inaccuracy. There are some exceptions to this set out in the *Privacy Act*.

If you make an access request, PCCS will ask you to verify your identity and specify what information you require. PCCS may ask the reason for your request so we can assist you most effectively. However, you are under no obligation to provide a reason if you do not wish to.

## How you may complain about a breach of the Australian Privacy Principles, and how PCCS will deal with such a complaint

If you believe your personal information is not properly protected, or that there has been a breach or potential breach of this Privacy Policy or the *Privacy Act*, please contact PCCS immediately and ask for your complaint or concern to be directed to the PCCS Quality Manager.

PCCS takes privacy seriously and has procedures to help identify and resolve a breach, potential breach or complaint as quickly as possible. This includes appropriate escalation processes to the CEO and the PCCS Finance Audit and Risk Committee and notification processes in the event of a breach.

Every complaint is forwarded by the staff member who receives it to the PCCS, Quality Manager. You will be notified of the process for dealing with the breach or potential breach. Your complaint will be thoroughly investigated and a suitable resolution negotiated with you.

## Complaints process

If you are not satisfied with the resolution of your complaint by PCCS, you may contact the Office of the Australian Information Commissioner who may investigate your complaint and has the power to award compensation against PCCS in appropriate circumstances.

## Further information

For enquiries or feedback about PCCS' privacy policy, or for complaints about PCCS' handling of personal information, please contact PCCS on (02) 9477 8700.

You can also fax your enquiry to (02) 9477 8799 or mail to:

Director – Corporate Services  
Primary & Community Care Services Limited  
PO Box 173  
Thornleigh NSW 2120