

Trafalgar Dental Care Privacy Policy

Trafalgar Dental Care recognize the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our privacy policy and it tells you how we collect and manage your personal information.

We respect your rights to privacy under the *Privacy Act 1988 (Cth)* (**Act**) and we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include, but is not limited to your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

Some personal information that we collect is considered "sensitive information". Sensitive information which we may collect includes your state of health and dental history. Unless otherwise stated, in this privacy policy, all references to personal information include sensitive information.

What personal information do we collect and hold?

We may collect and hold the following types of personal information:

- name;
- postal or street address;
- email address;
- telephone number;
- facsimile number;
- age and birth date;
- private health insurance information;
- Medicare, other government funding bodies and third party funding information;
- information pertaining to worker's compensation, motor vehicle or other accident claims;
- detail of the treatments and services provided to you by dental practitioners at our Dental Centre or previously provided to you at other dental center's;
- information that you provide to the dental practitioners and/or our employees in communication with them relating to the treatments and services provided;
- information you provide to us through our patient surveys;
- "promotion codes" if participating in any given promotional offers;
- payment method details;

- information obtained as a result of credit checks which you authorize us to carry out;
- family contact information; and
- if you are a member of a rewards program operated by any companies we partner with to offer you rewards (**Rewards Member**), details in relation to your membership of the program including with respect to earning and redeeming rewards points, and your points balances.

We may also collect some information that is not personal information because it does not identify you. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

We may use cookies and affiliate marketing tracking technologies such as e-tags that may capture your user journey through different websites.

How do we collect and hold your personal information?

We generally collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in a number of ways including:

- from documentation that you complete and submit;
- through your access and use of our website;
- during conversations between you and our representatives; or
- when you complete a transaction.

We may not always collect your personal information directly from you. Sometimes we collect your personal information from your personal acquaintances and friends through promotion of our services or campaigns such as "Refer a Friend". Information collected from your acquaintances and friends through such campaigns would be limited to your mailing or email address.

- We may also collect personal information from: third party companies such as your private health insurer, credit reporting agencies, companies we partner with to offer you rewards, law enforcement agencies and other government entities;
- dental practitioner(s) at our Dental Centre;
- other healthcare providers who have previously treated you (for example, where you request us to obtain your dental records from a dental practitioner who previously provided you with treatment) or are treating you (such as specialist dental practitioners); and
- dental technicians or laboratories where your treatment involves the manufacture of a prosthetic device.

Cookies

Trafalgar Dental Care website uses cookies, tracking pixels and related technologies. Cookies are small data files that are served by our platform and stored on your device.

Our site uses cookies dropped by us or third parties for a variety of purposes including to operate and personalize the website. Also, cookies may also be used to track how you use the site to target ads to you on other websites.

In addition, cookies used by this site may also be used for:

- Recording preferences that you specify on our websites
- Providing general visitor and customer analytics for internal reference
- Conducting research to improve our content, products and online services
- Assisting with direct marketing, should you opt-in for this service
- Supporting security measures, such as requiring you to re-login to a site after your account has been inactive for a period of time

If you do not wish to receive cookies you may disable these in your web browser, however please note that doing so may affect our sites' ability to function properly. See the 'Help' section of your web browser for more information on changing your cookie preferences.

If you wish to opt out of receiving targeted advertising, you can do so via the Network Advertising Industry website.

You can also opt-out directly through updating your preferences with Google and Facebook.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyze trends, administer the website, provide relevant content to users, monitor fraudulent activity, and gather broad demographic information.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested treatments or services to you, either to the same standard or at all;
- we may not be able to provide you with information about treatments and services that you may want; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

For what purposes do we collect, hold, use and disclose your personal information?

We collect, hold, use and disclose personal information about you so that we can perform our business activities and functions and to provide best possible quality of patient care and customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide treatments and services to you;
- to send communications requested by you;
- to assist with queries made by you by telephone, in writing or electronically;
- to answer enquiries and provide information or advice about existing and new treatments or services;
- to assess the performance of the website and to improve the operation of the website;
- to conduct business processing functions including providing personal information to our related bodies corporate, dental practitioners, contractors or third party service providers;
- for the administrative, marketing (including direct marketing), planning, treatment or service development, quality control and research purposes of Trafalgar Dental Care, its related bodies corporate, dental practitioners, contractors or third party service providers;

- to process private health insurance claims and Medicare claims;
- to provide your updated personal information to our related bodies corporate, dental practitioners, contractors or third party service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority;
- for planning and evaluation of accreditation activities;
- for credit verification purposes, transactions, fraud and credit worthiness;
- for billing purposes;
- for debt collection;
- to provide patient support;
- to generally better understand customer preferences and how to meet your needs now and in the future;
- to assess and potentially employ staff (please note that information of applicants may be retained regardless of whether successful in gaining employment or not); and to fulfil its contractual obligations under any Service and Facility Agreement Trafalgar Dental Care has entered into with dental practitioners; and
- if you are a Rewards Member, to enable you to redeem points and participate in promotions relevant to that reward program.

To whom may we disclose your information?

We may disclose your personal information to:

- our employees, dental practitioners, related bodies corporate, contractors or third party service providers for the purposes of operation of our business or our website, fulfilling requests by you, and to otherwise provide treatments and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- any designated third party provider nominated by you who you have indicated a relationship with and who you nominate to be either partly or wholly responsible for payment for services provided by Trafalgar Dental Care (such as your private health insurer);
- other dental practitioners directly involved in your treatment e.g. a specialist who you may be referred to external to Trafalgar Dental Care. Any information transferred in this instance is limited to that information directly relevant to your treatment;
- dental technicians or laboratories where your treatment involves the manufacture of a prosthetic device;
- suppliers and other third parties with whom we have commercial relationships for business, marketing, and related purposes, which may include social media platforms for targeted advertising purposes;
- if you are a Rewards Member, the companies which operate the relevant rewards program; and

- any organization for any authorized purpose with your express or implied consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate (within Australia).

Direct marketing materials

We may send you direct marketing communications and information about our treatments and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax, email and through social media platforms, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavor to use that method whenever practical to do so.

At any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in our marketing communications and we will then ensure that your name is removed from our mailing list. Unless you opt-out of receiving marketing communications from us, you consent to us using your personal information for direct marketing purposes.

We do not provide your personal information to other organizations for the purposes of their direct marketing. Trafalgar Dental Care complies with the Do Not Call Register Act 2006 (Cth) when conducting telephone marketing research.

How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting our Privacy Officer (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using the contact information below and provide comprehensive details of the incident so that we can investigate it.

We will treat your complaint confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

We will also undertake best endeavors to prevent future breaches by making any necessary changes to processes. If you are unhappy with our response to your complaint, you may contact the Office of the Australian Information Commissioner who may investigate your complaint further. Further information about the application

of the Act can be found at the website of the Office of the Australian Information Commissioner at www.privacy.gov.au.

Do we disclose your personal information to anyone outside Australia?

We may disclose your personal information to third party service and content providers that we engage to help us provide and manage our services including to process payments, website hosting service providers, data cloud services, electronic communication providers and data analysis. We take reasonable steps that your personal information is only used for the services/purposes we require.

Third party service and content providers may be located or store information in a range of countries outside of Australia. We require that these service and content providers comply with relevant Australian privacy laws and do not use the personal information which we provide to them for any purpose other than the specific services they are providing to you and/or us.

Security and how we hold your personal information

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorized access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed to perform our functions, except where it is retained for longer periods to comply with legislative requirements for document retention.

We also maintain computer and network security by various means including using firewalls and other security measures such as user identifiers and passwords to control access to our computer system.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Quality

We take reasonable steps to keep all current personal information up-to-date, accurate and complete. We will confirm identity of persons before giving access to your personal information.

Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices. We encourage you to read the privacy policies of any website you encounter to learn more about the privacy practices of that website.

Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below:

1) Mail

The Privacy Officer
Trafalgar Dental Care
65 Main Street
Trafalgar, 3820 VIC

2) Telephone

(03) 56331185

3) Email

privacyofficer@trafalgardentalcare.com.au

Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated on **15 September** 2016.