

# ORTHO-CRAFT PRIVACY GUIDELINES AND COMPLIANCE – ORTHO-CRAFT PRIVACY POLICY

## **1. INTRODUCTION**

1.1 Orthocraft Pty Ltd is a Dental Laboratory providing services to Orthodontists and Dentists.

1.2 Orthocraft is a private company (PTY LTD)

1.3 This policy applies to Orthocraft Pty Ltd and Fractional Bridge Pty Ltd.

## **2. PRIVACY OBLIGATIONS**

2.1 ORTHOCRAFT takes its privacy obligations very seriously and wishes to ensure that your personal information is dealt with in accordance with all relevant privacy laws and this privacy policy.

2.2 This privacy policy describes the way that we collect, use and disclose personal information about individuals.

2.3 "Personal information" is defined as information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. Personal information does not include de-identified data.

2.4 We are subject to:

(a) *The Privacy Act 1988 (Cth)* including the National Privacy Principles (NPPs);

(b) *Healthcare Identifiers Act 2010 (Cth)*;

(c) in relation to our operation in the Australian Capital Territory, the Health Records (Privacy and Access) Act 1997 (ACT);

(d) in relation to our operation in New South Wales, the *Health Records and Information Privacy Act 2002 (NSW)*; and

(e) in relation to our operation in Victoria, *the Health Records Act 2001 (Vic)*.

2.5 On 1st November 2010 the Office of the Privacy Commission was integrated into the Office of the Australian Information Commission (OAIC) which is now responsible for administering the *Privacy Act 1988 (Cth)*.

## **3. COLLECTION OF PERSONAL INFORMATION**

(a) What personal information does ORTHOCRAFT collect? ORTHOCRAFT collects personal information about its clients/patients and clients/patients of ORTHOCRAFT Associates which is required for ORTHOCRAFT to provide services.

(b) Personal information ORTHOCRAFT may collect includes, but is not limited to:

(i) your name

(ii) your address, contact details;

(iii) your qualifications and practice details; and

(iv) your use of our services.

(c) ORTHOCRAFT also provides feedback from consumers. In this case, ORTHOCRAFT may collect the name and contact details of the consumer.

(d) Please provide to us current and accurate information so that we can provide our services to you.

## **4. USE AND DISCLOSURE OF PERSONAL INFORMATION**

### **4.1 Primary Purpose**

(a) We use and disclose your personal information for purposes including:

(i) processing invoices and statements;

(ii) the mailing of ORTHOCRAFT publications;

(iii) publishing special communications from ORTHOCRAFT to clients/patients, e.g. Holiday closing times;

(iv) the provision of clients/patient services provided under ORTHOCRAFT agreements;

(v) providing discounts to clients/patients on commercial services, e.g. bulk discounts;

(vi) the collection and verification of contact details for communication with clients/patients on ad hoc basis; and

(vii) other purposes which you have consented to.

# ORTHO-CRAFT PRIVACY GUIDELINES AND COMPLIANCE – ORTHO-CRAFT PRIVACY POLICY

## 4.2 **Secondary Purposes**

ORTHO-CRAFT may also use and disclose personal information for the following secondary purposes:

- (a) the communication of personal information to service providers with which ORTHO-CRAFT has co-operative arrangements; e.g. insurance providers
- (b) the provision of clients/patients personal information to the relevant ORTHO-CRAFT associate;

## 4.3 **Partners**

We may engage third party suppliers to perform functions for us from time to time, for example information technology or other dental laboratories. Each of these suppliers has confidentiality arrangements with us. Any access to your information will occur in the performance of their contractual obligations to us and not for other usage.

## 5. **DATA QUALITY**

ORTHO-CRAFT will take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date.

## 6. **DATA SECURITY**

6.1 ORTHO-CRAFT takes all reasonable steps to protect all information held by ORTHO-CRAFT (including your personal information) from misuse and loss and from unauthorised access, modification or disclosure.

6.2 We use technologies and process such as (access control procedures, network firewalls, encryption and physical security) to protect your privacy.

6.3 ORTHO-CRAFT will destroy or permanently de-identify any of your information which is no longer needed.

## 7. **OPENNESS**

7.1 This privacy policy sets out how we collect, use and disclose personal information.

7.2 This Privacy Policy is provided to clients/patients and will be made available on request to the general public.

## 8. **ACCESS AND CORRECTION**

8.1 You may request access to the information held about you by ORTHO-CRAFT at any time.

8.2 ORTHO-CRAFT may deny access to information in certain circumstances as permitted by law.

8.3 Personal information provided by you can be updated by you if the information provided is incorrect or out of date.

8.4 If an ORTHO-CRAFT client/patient wants to gain access to or correct any of the personal information held by ORTHO-CRAFT about that client/patient, or if further information on how ORTHO-CRAFT handles personal information is required, please contact the privacy officer below.

## 9. **IDENTIFIERS**

ORTHO-CRAFT will not adopt, use or disclose an identifier that has been assigned by any government "agency", except health care identifiers for purposes permitted under the Healthcare Identifiers Act 2010 (Commonwealth).

## 10. **ANONYMITY**

ORTHO-CRAFT will give clients/patients and consumers the option to interact anonymously with ORTHO-CRAFT or under a pseudonym whenever it is lawful and practical to do so.

## 11. **TRANS-BORDER DATA FLOWS**

ORTHO-CRAFT will not transfer personal information to a recipient in a foreign country without your prior written consent or unless this information will have appropriate protection as required by the relevant privacy laws.

# ORTHO-CRAFT PRIVACY GUIDELINES AND COMPLIANCE – ORTHO-CRAFT PRIVACY POLICY

## **12. SENSITIVE INFORMATION**

ORTHO-CRAFT will not collect sensitive information unless the individual has consented, it is required by law, or in other special specified circumstances, for example relating to health services provision and individual or public health or safety.

## **13. POLICY**

13.1 All employees and contractors to ORTHO-CRAFT, in the course of their employment or contract with ORTHO-CRAFT must comply with this privacy policy.

## **14. CONTACT US**

If you wish to access or correct your personal information or make a complaint in relation to your privacy, please contact ORTHO-CRAFT at:

Privacy Officer  
Orthocraft Pty Ltd  
Level 1 - 118 Yarrara Rd  
Pennant Hills NSW 2120  
(02) 99802117

### **Policy Statement 1.0**

Adopted by Orthocraft Pty Ltd 21/1/2014