

# Privacy Policy of Sydney Psoriasis Skin Clinics

## SCOPE:

1. This privacy policy is written in consideration of, and is intended to be in keeping with the 'Australian Privacy Principles' (APPs) of the Australian Privacy Act 1988, as amended, and it describes how we manage sensitive personal information gathered in order to provide naturally-based skin condition services to the public.
2. The confidential information that may be collected, held and managed by this entity includes, but is not limited to, information supplied by the patient on a patient information and history sheet as well as notes kept by the Practitioner and business generally during the course of treatment and maintenance of the patients' skin condition.
3. This confidential information may include: patient's full name, date of birth, home address, email address, marital status, type of employment type, phone numbers, skin condition diagnosis, pathology or other reports as supplied, any family history of skin conditions, presenting symptoms, inflammation level markers and other markers relating to severity, chronic/acute levels and other markers, as well as dietary information and information relating to chemicals, lifestyle and drugs to which the patient may be exposed.
4. Other information that is kept includes information necessary to assist evaluation of the likely prognosis of success levels possible for the individual patient, and then additional information necessary to treat accordingly.
5. Additional information that may be collected is photographic evidence of the skin condition lesions at the time of the initial consultation, or before, if supplied by the patient, as well as progressive additional photographic information acquired during the treatment period, all of which is unaltered, stored as originally created, or cropped and/or printed, and appropriately marked with chronological and other property and file-type information.
6. In order to appropriately deal with the patient, standard business practices relating to financial transactions creates additional information such as some financial and accounting information which is recorded on a hard copy file; some of which is also stored electronically.
7. Unless required to enable the facility of posting orders to the patient as the treatment unfolds, credit card information is not normally kept in any form as the card details are truncated on any credit card or Eftpos vouchers, thus rendering them unreadable and unidentifiable.
8. We do not collect nor store any photographic ID information, nor any external financial records or credit information, and other than mentioned above we normally do not gather nor store any other external medical history relating to patients from other medical professionals.
9. At no time is any confidential identifiable patient information sold or otherwise disposed of or shared with any other person or entity for any remuneration, except possibly should the business be sold.
10. In the case of a business sale, the new owner must as a prerequisite of the sale, then sign a confidentiality agreement relating to the patient information so acquired, and be

subject to the same onus of responsible handling of the information as was evident at that time.

## **IMAGES**

1. Images on our website and elsewhere are displayed for the purposes of identification of skin conditions and to demonstrate the potential degree of skin condition resolution that may be possible, although results are not necessarily typical.
2. All steps are taken to protect the identity of the individual depicted in images by blacking out, cropping or otherwise obscuring the images to the extent that the patient is not reasonably identifiable
3. Various codes are used to protect the identity of persons depicted in images & to provide anonymity or pseudonymity through the use of those codes.
4. The codes, which may be in the form of a series of characters, or first names, are not necessarily anagrams or real first names of persons in the depicted images, but are all cross-referenced in a retrieval system.
5. The codes are used to provide a file reference only so that any images may, if required, be substantiated as being authentic untouched original or cropped/obscured images.
6. Images shown on our website or on any online directory or other online advertising medium, are all watermarked with our business name for security reasons, and the watermark layer is merged-down to lock it into a single image layer prior to being uploaded to the website

## **COLLECTION:**

1. Information is collected by means of patient disclosure prior to, during and after an initial consultation, and then during the treatment process
2. At the initial consultation, patients are requested to provide personal identifiable information by means of a form that they complete and then additional verbal information is requested during the consultation. The information gathered at that time enables this business to create a validated record, based upon the information voluntarily provided by the patient
3. Additional information relating to the practitioners' perceptions and clinical markers demonstrated by the patient during consultations, is recorded by the consulting practitioner as a means of assisting in the assessment and process of attempting to reduce the skin condition symptoms, or to hopefully resolve the appearance of the skin condition.

## **DISCLOSURE(sharing):**

1. At no time is any confidential identifiable patient information sold or otherwise disposed of or shared with any other person or entity for any remuneration, except possibly should the business be sold.
2. In the case of a business sale, the new owner must as a prerequisite of the sale, then sign a confidentiality agreement relating to the patient information so acquired, and be

subject to the same onus of responsible handling of the information as was evident at that time.

3. No confidential identifiable patient information is provided by us to any external body, neither in Australia nor overseas, except with the express written consent of the patient, or in the event that a government department or agency in Australia, who has the power to do so, orders us legally to provide such information, and additionally, no information other than what is absolutely required, is so provided.
4. We do not share patient information with other health care practitioners without the express written permission of the patient concerned, or their legal guardian.
5. In the event that any contractor is introduced to this business, the contractor must sign a confidentiality agreement relating to the patient information privy to, and be subject to the same onus of responsible handling of the information as was evident at that time.

## **SECURITY - We take security very seriously!**

1. Confidential patient information that is stored at our premises in a hard copy format or other information that is stored electronically, is done so with considerable security measures to safeguard the information.
2. Our premises are secured with multi-layers of primary protection but are also further locked up with other security monitoring devices and software-based surveillance equipment, and the information collected is automatically and immediately uploaded to cloud-based secure storage.
3. Additionally, any electronic files are protected with complex algorithmic encryption and backed up to cloud-based storage.
4. Access to our data from the internet is also secured by significant convoluted multi-level security technology, which we cannot divulge here, for obvious reasons.
5. Our website is also protected with multi-layer procedures including triple layer of protection from hackers, bots and malicious script (ip address collection, complicated algorithms, time-out, multi-attempt, black-hole technology, un-obvious administrator login and complex passwords, and a variety of other convoluted technological defences which again we cannot divulge, for obvious reasons.
6. All visitors to our website will have their ip address noted, and we use Google Analytics and some other analytics facilities to provide us with various traffic reports including device and some general location information etc. However, no personally identifiable information relating to visitors to our website is gathered, stored or used, other than when a malicious user or identity-thief attempts to break through our defences which automatically activates location tracking and other security software.
7. When a hard-copy file is archived it is then destroyed by being picked up by a security-destruction company, and turned into a mush and finally into recycled paper.
8. Prior to that destruction, personal information is rendered mostly useless and some parts of it are actually separated and shredded prior to the security destruction

## **RIGHTS & CHOICES:**

1. Confidential information held by this business is contained in various files and databases, and is the property of this business

2. While patients do not have the right to possess our files on them, they do have the right to ensure that the information is current and accurate and they have the right to request that any erroneous information held by us on them, is corrected
3. Should any patient feel that they have a valid reason for access to information held by us on them, they should direct their enquiries to any staff member based at our main clinic of Sylvania Heights, or email us by clicking [HERE](#)

## **COMPLAINTS:**

1. If a patient has any valid concerns over their privacy, those concerns should in the first instance be directed to any staff member based at our main clinic of Sylvania Heights, or they should email us by clicking [HERE](#)
2. Those concerns will be taken very seriously and will be directed to the most senior members of our business for action
3. A senior member of our business will then contact the patient and work with them to address their concerns in a professional and courteous manner in order to find an amicable and appropriate resolution to their valid concerns
4. In the event that an amicable resolution cannot be reached, we may then refer the matter to an appropriate body who will enlist the services of a mediator, or we may refer to other external bodies, external resolution schemes or the OAIC as deemed appropriate in order to determine a definitive resolution based upon the laws of Australia. The decision of that external body shall be final.
5. The Office of the Australian Information Commissioner (OAIC) is responsible for case management and resolution of privacy and Freedom of Information complaints and reviews

## **CHILDREN**

1. As children are prone to many skin conditions, we do have children as patients from time to time.
2. Children have a greater requirement for sensitive handling of their personal information, due to obvious vulnerabilities, and so special mention should be made of our means of storing the identifiable information on children that is held in trust by us.
3. The purpose of gathering and storing personally identifiable information of child patients is for the exact same reasons as with adults: initial information is collected to assist evaluation of the likely prognosis of success levels possible for the individual patient, and then additional information necessary to treat accordingly is acquired as the treatment progresses.
4. Personal identifiable information that we hold in trust on children in our care will never be sold, published, disclosed or otherwise be made available to any person or entity, either in Australia or overseas, for any reason other than for fair use, and even then the information as it relates to specific identification of the child will be redacted, obscured, cropped or otherwise defaced as necessary to prevent any reasonable identification.
5. An exception of the above clause would be in the event that we are required by law to disclose that information to a person or entity who has a legally enforceable right to obtain the information and has demanded such disclosure through a written document validated by a government institution or body based in Australia.

6. In the case of above, the entity who received the legally enforced disclosure of information from us must be subject to the same, if not a greater, onus of responsible handling of the information as we were to that time.
7. All the same policy clauses as detailed in all sections above, as they relate to any personal information that we hold in trust on children, apply equally to children

**CONTACT:**

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Sydney Psoriasis