

UFS Dispensaries Ltd Privacy Policy

The Privacy Policy of UFS Dispensaries Ltd has been developed in accordance with **Victorian Health Records Act 2001**, **National Privacy Principles**, and complies with **The Privacy Act**.

This policy details how UFS will collect, store, manage and disclose sensitive and personal information about our customers and members.

1. Collection

UFS collects the following types of information:

- i. **Membership Information:** This is collected for the purposes of membership management. Information collected includes title, name, phone number, address, email, date of birth, interests and details of dependant family members including date of birth, email and phone number.
The information collected is not passed onto to any third party, and is treated in accordance with wishes expressed by members at the time of joining or renewing their membership.
- ii. **Accounts Information:** This is collected for the purposes of account management. Information collected includes title, name, date of birth, address, phone number, reasons for requiring a UFS account, estimated credit limit required, copy of drivers licence, and details of next of kin including name, address, phone number and relationship.
- iii. **Dispensary Records:** This information is collected for the purposes of safe and accurate dispensing of medication and as required by legislation. The information that is collected includes name, address, medication details, member number if applicable, medicare number, or any concession numbers if applicable.
- iv. **Recruitment:** This information is collected for the purpose of recruiting new employees. Generally this information is obtained in the form of personal resumes. The information collected includes name, address, previous employment, qualifications, work experience and referees.
- v. **Competitions:** This information is collected purely for the purpose of in store promotions. The information collected includes name, address, contact number, copy of receipt with purchase history may be attached and membership number (if necessary).
- vi. **Peace and Quiet Client Records**
Peace and Quiet collects personal information from clients to ensure correct treatment is undertaken on a client. The information collected includes name, address, phone number, date of appointment, date of birth, occupation, general health information, specific questions relating to injuries, family history, previous treatments and activities undertaken, skin care information, lifestyle questions and any additional information.
- vii. **Medical Patient Records**

UFS Medical collects personal information related to patients in the delivery of quality medical care. The information collected includes name, address, contact numbers, occupation, date of birth, medicare / veteran affairs details, referral details, emergency person contact details including name, relationship, address and contact number, guardian or parent details if applicable, signature and date.

2. Use and Disclosure

Membership Information is used for the purpose of mailing MemberCare News, other marketing material, member information, including additional cards, annual renewal, annual reports and notice of Annual General Meeting. Membership and sales data is not disclosed to any third party unless a member expressly consents, or where required by law.

Account Information is only used for purposes of account management. UFS Dispensaries Ltd may give information about you to a credit reporting agency, but only limited kinds of information allowed by the Privacy Act. This includes: your name, date of birth, current known address, two previous addresses, your current or last employer, your drivers licence number, the fact that you have applied for credit and the amount, the fact that UFS is a provider to you, payments overdue for at least 60 days, which UFS has taken steps to recover, advice that payments are no longer overdue, cheques drawn by you which have been dishonoured more than once, the opinion of UFS that you have committed a serious credit infringement and when credit provided to you has been discharged.

Recruitment Records are used for the purpose of sourcing candidates for positions vacant.

Competitions / in store Promotions Information is used for the purpose of identifying and contacting winners of promotions and competitions and for this purpose only. The winners of these competitions will be publicly identified / acknowledged. The entry of a competition is deemed consent to publish winners details.

Dispensary Records are health records which are used to assist in the dispensing and delivery of medicines, process claims to the Health Insurance Commission, Department of Veterans Affairs, TAC, Workcover and other compensatory bodies. The lodgement of a prescription at a UFS Pharmacy will be deemed to be consent for the appropriate records of the prescription or other medication to be maintained at that pharmacy. A person collecting a prescription medicine on behalf of another person will be deemed to have consent if they are in possession of the prescription receipt chit issued at the time of lodgement. A person collecting a script on behalf of another person will be required to satisfy pharmacy staff that they have the individuals consent to collect the medication on their behalf.

Disclosure of individual health records to a third party only occurs when required for one of these purposes, or when required by law. When disclosure is required by law, where permitted UFS will advise the individual concerned of the disclosure.

Disclosure to a third party for other purposes (eg. calculation of PBS Safety Net entitlement, or taxation records) will only occur with the expressed consent of the individuals whose records are being disclosed. When a child or young person is not competent to make their own decision about the privacy of their information, UFS will disclose this information to the parent or guardian. In general, UFS will require written consent from children aged over 12 years.

Peace and Quiet Client Records

Peace and Quiet Client Records are collected to ensure the correct treatment is undertaken on a client and no pre existing conditions exist. This information is also collected to mail out promotions, specials and general marketing material. Peace and Quiet Client records are not disclosed to any third party unless a client expressly consents, or where required by law.

Medical Patient Records

To deliver the best quality of care to you, there may be occasions where the information is shared with other treating health professionals. Your information will only be used for purposes relating to your health, or to inform you of general health matters. There may also be occasions when your health information is included anonymously in clinical audits for the purpose of doctors' continuing medical education.

In situations where it is necessary to provide information to a third party, such as your employer or insurance company, for work related injury or illness, you will be asked to provide your consent.

Consent is not required for some medical practice-related purposes, such as providing basic information to Medicare, your health fund or for billing and account management. In emergency or when required by law to disclose basis information, consent is also not required.

3. Data Quality

UFS Dispensaries will take all reasonable steps to ensure the personal and health information the organisation collects, uses, holds and discloses is accurate, complete, up to date and relevant. We will do this by:

- Verifying the accuracy, completeness and relevance of personal and / or health information when it is collected; and
- Maintaining the accuracy, currency, completeness and relevance of the personal and health information we hold.

4. Data Security and Data Retention

UFS Dispensaries will take reasonable steps to ensure the personal and health information we hold is protected from misuse and loss, and from unauthorised access, modification or disclosure. We will do this through:

- The provision and use of lockable storage facilities for paper based records;
- The provision and use of appropriate security measures for electronic records, including password protection
- The maintenance of appropriate physical and security measures for UFS Dispensaries offices and facilities; and
- Restricting employee access to personal and health information on a "need to know" basis

Reasonable steps will be taken to destroy or permanently de-identify personal or health information if it is no longer required.

5. Openness

UFS Dispensaries will be open in how it manages the personal and health information it collects.

6. Access and Correction

UFS Dispensaries will provide individuals with access to their personal and or health information on request, except to the extent that:

- Providing access would pose a serious threat to the life or health of any individual;
- Providing access would have an unreasonable impact on the privacy of another individual;
- The request for access is frivolous or vexatious;
- For health information, the request is unreasonable and repeated, with access to the same information having previously been reported
- There are considerations with regard to legal proceedings which are underway, being investigated or anticipated
- Providing access would be unlawful.

Any requests for access of personal or health information held by UFS Dispensaries requires the individual to fill in a Request for Information Form which can be found on our website www.ufs.com.au or by contacting one of our pharmacies.

Information may only be given to the owner of the information or to someone authorised to collect it. Information will generally be available for collection within 24 hours.

If an individual identifies that the information held by UFS Dispensaries about them is inaccurate, incomplete, misleading or not up to date, they may request that the information be corrected. UFS Dispensaries will then make all reasonable efforts to correct the information.

Requests for access or correction of personal or health information are to be made to:

**The Privacy Officer
UFS Dispensaries
PO Box 301
BALLARAT 3353**

7. Identifiers

A membership number will be allocated to each member as an identifier of that member for the purposes of UFS Dispensaries operations.

An identifier assigned to an individual by another agency or body will not be used or disclosed, unless required by law or express consent is given.

8. Anonymity

Wherever lawful and practicable, UFS Dispensaries will provide individuals with the option of being provided with a product or service by us on an anonymous basis.

9. Transborder Data Flows

Under the National Privacy Principles UFS Dispensaries will not disclose an individual's personal information to an organisation or individual outside Australia unless, generally, the country to which it is being disclosed has a similar level of privacy protection or the individual, or their authorised or legal representative, has consented to the disclosure.

Under the Information Privacy Principles and Health Privacy Principles we will not disclose an individual's personal and or health information to an organisation or individual outside Victoria unless, generally, the state or country to which it is being disclosed has a similar level of personal information and health records protection or the individual, or their authorised or legal representative, has consented to the disclosure, or the disclosure is required by law.

10. Sensitive Information

Sensitive information will not be collected unless;

- The individual has consented such collection; or
- The collection is required by law; or
- The collection is necessary to prevent or lessen a serious and imminent threat to the life or health of an individual.

UFS Dispensaries will not disclose any sensitive information without the consent of the individual.

11. Disposal of Information

All information that is to be disposed of will be placed in a locked confidential bin. This information will be either shredded or pulped. UFS Dispensaries then receive written confirmation that the documents have been destroyed in the correct manner.

12. Complaints

Should an individual, or their authorised or legal representative, have a complaint regarding our privacy practices or wish to make a complaint about how their personal / and or health information has been managed, they should in the first instance contact the UFS Dispensaries Privacy Officer on (03) 5327 7700. Any complaints received will be handled in accordance with our Privacy Complaints Policy.