

Sight Foundation Theatre

PRIVACY

POLICY

Sight for Life Foundation Theatre is committed to protecting the privacy of the personal information and sensitive information which it collects and holds. Sight for Life Foundation Theatre must comply with the Australian Privacy Principles under the Privacy Act 1988 (Cth), and other applicable state privacy laws which govern the way in which organisations hold, use and disclose personal information (including your sensitive information).

The purpose of this Privacy Policy is to explain:

- (a) the kinds of information that Sight for Life Foundation Theatre may collect about you and how that information is held;
- (b) how Sight for Life Foundation Theatre collects and holds personal information;
- (c) the purposes for which Sight for Life Foundation Theatre collects, holds, uses and discloses personal information;
- (d) how you can access the personal information Sight for Life Foundation Theatre holds about you and seek to correct such information; and
- (e) the way in which you can complain about how your personal information has been managed and how Sight for Life Foundation Theatre will handle that complaint.

Definitions

In this Privacy Policy the following terms have the following meanings:

personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not;

sensitive information (a sub-category of personal information) means:

- c) personal information or opinion about an individual's:
 - (i) racial or ethnic origins;
 - (ii) political opinions or political associations;
 - (iii) philosophical beliefs or religious beliefs or affiliations;
 - (iv) sexual preferences or practices; or
 - (v) criminal record; or
- (d) health information about an individual; or
- (e) genetic information about an individual that is not otherwise health information.

health information (a sub-category of sensitive information) is:

- (f) personal information or an opinion about:
 - (i) an individual's physical or mental health or disability (at any time);
 - (ii) an individual's express wishes about the future provision of health services for themselves; or
 - (iii) a health service provided, or to be provided, to an individual;
- (g) other personal information collected to provide, or in providing, a health service;
- (h) other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- (i) genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

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Collection and use of personal information

Types of personal information collected by Sight for Life Foundation Theatre

Sight for Life Foundation Theatre will only collect information which is necessary to provide you with health care services or appropriately manage and conduct our business. This may include (as applicable):

(a) **Patients/residents/clients/research participants** Sight for Life Foundation Theatre collects information from you which is necessary to provide you with health care services or to enable you to participate in research studies. This includes collecting personal information such as your name, address, health history, family history, past and current treatments, lifestyle factors, and any other information which is necessary to assist the health care team in providing appropriate care, or our research team in conducting its research.

(b) **VMOs, students, contractors and volunteers** Sight for Life Foundation Theatre collects information from you which is necessary to properly conduct, manage and operate its business. This includes collecting personal information such as your name, address, professional experience, qualifications and past employers, and any other information which may be necessary to appropriately conduct and manage its business.

(c) **Job applicants** Sight for Life Foundation Theatre collects information from you which is necessary to assess and engage job applicants. This includes collecting personal information such as your name, address, professional experience, qualifications, references and past employers, and any other information which is necessary to process your job application.

(d) **Donors** Where you have consented, Sight for Life Foundation Theatre collects information from you for the purposes of fundraising for Sight for Life Foundation Theatre including agreeing the terms of and managing any donations you agree to make. This includes collecting personal information such as your name and address.

How we collect personal information

We will usually collect your personal information directly from you, however sometimes we may need to collect information about you from third parties, such as:

- (a) relatives;
- (b) another health service provider;
- (c) past employers and referees.

We will only collect information from third parties where:

- (e) you have consented to such collection;
- (f) such collection is necessary to enable us to provide you with appropriate health care services (such as in the case of emergency medical treatment);
- (g) such collection is reasonably necessary to enable us to appropriately manage and conduct our business (such as in assessing applications for accreditation from VMOs); or
- (h) it is legally permissible for us to do.

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How Sight for Life Foundation Theatre uses your personal information

Pursuant to applicable privacy laws Sight for Life Foundation Theatre only uses your personal information for the purpose for which it was collected (primary purpose), unless:

- (a) there is another purpose (secondary purpose) and that secondary purpose is directly related to the primary purpose, and you would reasonably expect, or Sight for Life Foundation Theatre has informed you, that your information will be used for that secondary purpose;
- (b) you have given your consent for your personal information to be used for a secondary purpose; or
- (c) Sight for Life Foundation Theatre is required or authorised by law to use your personal information for a secondary purpose (including for research and quality improvements within Sight for Life Foundation Theatre).

For example, Sight for Life Foundation Theatre may use your personal information to:

- (d) provide health care services to you;
- (e) facilitate the provision of ongoing health related services to you;
- (f) appropriately manage and conduct our business, such as assessing insurance requirements, conducting audits, and undertaking accreditation processes;
- (g) assist us in running our hospital business, including quality assurance programs, billing, improving its services, implementing appropriate security measures, conducting research and training personnel;
- (h) where required, effectively communicate with third parties, including Medicare Australia, private health insurers and Department of Veterans' Affairs; and
- (i) carry out fundraising activities (where you have consented).

Disclosing your personal information

Sight for Life Foundation Theatre will confine its disclosure of your personal information to the primary purpose for which that information has been collected, or for a related secondary purpose. This includes when disclosure is necessary to provide services to you, to help us manage and conduct our business, or for security reasons. We may provide your personal information to:

- (a) third parties involved in your care, including healthcare professionals outside of Sight for Life Foundation Theatre, such as:
 - (i) pathologists and radiologists who have been asked to undertake diagnostic testing;
 - (ii) senior medical experts and specialists who have been asked to assist in diagnosis or treatment; (iii) other health professionals involved in an individual's further treatment (such as general practitioners, physiotherapists and occupational therapists);
- (b) government agencies, such as Defence or Department of Veterans Affairs, where an individual is receiving services with Sight for Life Foundation Theatre under arrangements with those agencies;
- (c) government departments responsible for health, aged care and disability where Sight for Life Foundation Theatre is required to do so, including uploading documents to the My Health Record;

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- (d) relatives, close friends, guardians (such as Medical Treatment Decision Maker, Enduring Guardian or Enduring Power of Attorney) unless Sight for Life Foundation Theatre has been told otherwise;
- (e) third parties contracted to provide services to Sight for Life Foundation Theatre, such as entities contracted to assist in accreditation or survey processes;
- (f) research institutions with which Sight for Life Foundation Theatre collaborates;
- (g) private health insurance providers and Medicare Australia;
- (h) your employer and workers compensation insurers where you have consented to us corresponding with them such as in relation to a workers compensation claim;
- (i) fundraising institutions associated with Sight for Life Foundation Theatre (where you have consented);
- (j) legal advisors, the Health Care Complaints Commission NSW (if applicable);
- (k) anyone authorised by you to receive your personal information (your consent may be express or implied);
- (l) anyone Sight for Life Foundation Theatre is required by law to disclose your personal information to.

Where we engage third party service providers, we may disclose personal information to those service providers who may use, process and/or store that information overseas.

Data storage, quality and security

Data quality

Sight for Life Foundation Theatre will take reasonable steps to ensure that your personal information which is collected, used or disclosed is accurate, complete and up to date.

Storage

All your personal information held by Sight for Life Foundation Theatre is stored securely in either hard copy or electronic form, including cloud based systems. Some hard copy records are stored off site using a third party storage provider.

Data security

Sight for Life Foundation Theatre strives to ensure the security, integrity and privacy of personal information, and will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Sight for Life Foundation Theatre reviews and updates (where necessary) its security measures in light of current technologies, including cloud based systems.

Online transfer of information

While Sight for Life Foundation Theatre does all it can to protect the privacy of your personal information, no data transfer over the internet is 100% secure. When you share your personal information with Sight for Life Foundation Theatre via an online process, it is at your own risk. There are ways you can help maintain the privacy of your personal information, including: (a) always closing your browser when you have finished your user session; (b) always ensuring others cannot access your personal

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information and emails if you use a public computer; and (c) never disclosing your user name and password to third parties.

2017 Amendments to the Privacy Act 1988

The passage of the Commonwealth Privacy Amendment (Notifiable Data Breaches) Act 2017 established a Notifiable Data Breaches (NDB) scheme in Australia. The NDB scheme requires organisations covered by the Australian Privacy Act 1988 (such as Sight for Life Foundation Theatre) to notify any individuals likely to be at risk of serious harm by a data breach. In some cases of a data breach the Office of the Australian Information Commissioner (OAIC) must also be notified. The Privacy Amendment (Notifiable Data Breaches) Act prescribes timelines for the notification process to the OAIC.

Sight for Life Foundation Theatre has established a Data Breach Policy that details how Sight for Life Foundation Theatre must deal with any instance where there has been a potential or actual breach of personal information held by an entity in either electronic or hard copy form.

All Sight for Life Foundation Theatre staff are required to familiarise themselves with the Data Breach Policy and its processes and ensure the plan is followed whenever a data breach is suspected or discovered.

Accessing and amending your personal information

You have a right to request access to your personal information which Sight for Life Foundation Theatre holds about you. If you make a request to access your personal information, we will ask you to verify your identity and specify the information you require. While Sight for Life Foundation Theatre aims to meet all requests for access to personal information, in a small number of cases and where permitted to do so by law, Sight for Life Foundation Theatre may not give access or may do so only under conditions. You can also request an amendment to your personal information if you consider that it contains inaccurate information. Sight for Life Foundation Theatre will consider and formally respond to any such request.

You can contact Sight for Life Foundation Theatre about any privacy issues as follows:

The Privacy Officer

Phone: (02) 9234 1999

Email: csm@sightfoundationtheatre.org.au

Subject to applicable laws, Sight for Life Foundation Theatre may destroy records containing personal information when the record is no longer required by us.

Complaints

If you have a complaint about Sight for Life Foundation Theatre's information handling practices or consider we have breached your privacy, you can lodge a complaint with:

(a) Our Privacy Officer; or

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(b) the Office of the Australian Information Commissioner.
Sight for Life Foundation Theatre aims to deal with all complaints in a fair and efficient manner.

REFERENCES

Australian Government Office of the Australian Privacy Commissioner, Australian Privacy Principles, <https://www.oaic.gov.au/privacy/australian-privacy-principles/>

Health Records and Information Privacy Act 2002 (NSW),
<https://www.legislation.nsw.gov.au/view/pdf/asmade/act-2002-71>

Privacy Act 1988 (Cth), <https://www.legislation.gov.au/Details/C2014C00076>

RELEVANT DOCUMENTS

DOCUMENT HISTORY *(Review period 2 years)*

Date	Version No.	Amendments/Comments	Approval
Feb 2017	0	New document	Feb 2017
Feb 2021	1	Updated to reflect current privacy requirements	
June 2022	1	Final approval by Board	Approved by MAC 16.5.22 Approved by Board 3.6.22