

**1300** **S** **M** **I** **L** **E** **S**  
*Dentists*

Privacy Policy

## **Policy Overview**

This policy outlines the ways in which 1300SMILES Ltd (“we”) collect, use, disclose, store, secure, manage and dispose of your personal information in accordance with the Australian Privacy Principles (“the APP’s”).

Where the words “personal information” are used in this policy, that expression means information or an opinion that is either specifically about you, or if you are not specifically identified but you are reasonable capable of being identified, irrespective as to:

- Whether the information or opinion is true or not; and
- Whether the information or opinion is recorded in a material form or not.

### **The kinds of personal information we collect and hold [APP 1.4(a)]**

The kinds of personal information we collect and hold may include (but is not limited to):

- full name;
- street and postal addresses;
- telephone numbers (including home, work and mobile);
- facsimile numbers;
- email addresses;
- dates of birth;
- how patients were referred to us;
- occupation of patients and the industry they work in;
- general health and past medical and surgical events of patients and potential patients;
- information collected from you as a result of you using our services;
- information contained in any curriculum vitae submitted by or on your behalf, including cover letters and emails (if applicable);
- notes made about you and correspondence with you in respect of any recruitment process (if applicable); and
- information that may assist us in marketing our services.

We may also collect and hold information including (but not limited to) personal information about:

- patients, potential patients, employees and contractors, potential employees and contractors, business associates and their employees and the like (former and current);
- visitors to our website;
- job applicants;
- suppliers, service providers and their employees (former and current); and
- others we come into contact with.

### **How we collect and hold your personal information [APP 1.4(b)]**

Personal information may be collected from you in a number of different ways including (but not limited to):

- face-to-face, teleconference and videoconference meetings and appointments;
- telephone conversations;
- documentation provided to us;
- our website;

- emails and written correspondence that you or someone on your behalf sends to us; and
- third parties (for example, your medical practitioner, referees).

We are committed to protecting your personal information from misuse and loss, and from unauthorised access, modification and disclosure, and will take reasonable steps to do so.

If we no longer need or are no longer required to hold your personal information, we may destroy or permanently de-identify that information, without further notice to you.

#### **The purposes for which we collect, hold, use and disclose your personal information [APP 1.4(c)]**

The purpose in which we may require personal information from you may include (but is not limited to):

- providing the services that you have requested from us;
- administering and managing those services including planning appropriate care and service arrangements, and charging, billing and collecting debts;
- conducting appropriate checks for credit-worthiness (if applicable);
- communicating with you or someone who acts on your behalf;
- enabling our related entities to assist you with related services (as and when required);
- researching, developing and enhancing our services;
- marketing our services to you by way of promotional and educational material, invitations to functions and seminars, and our various newsletters;
- maintaining and developing our business systems;
- assessing your suitability for employment or contract roles within our organisation; and
- complying with our legal obligations.

As well as using your personal information for the primary purposes for which you provided it to us, we may also use the information for related secondary purposes, although we will endeavour to contact you for your express consent should the secondary purpose be one which we consider you may not reasonably expect. Examples of related secondary purposes include:

- insurance purposes;
- exchanging information with a subsidiary entity and our agencies;
- quality assurance purposes; and
- other related purposes.

The people and organisations to which we disclose your personal information to may include:

- our staff members;
- your authorised representatives;
- government and regulatory authorities and other similar organisations (as required and / or authorised by law); and
- our related entities.

Please note that we do not sell or give the information contained in our databases or mailing lists to any third parties.

#### *Our Website and Blogs:*

We collect website and blog activity statistics such as the number of visitors, pages visited, time and date of visit and where you accessed our website or blog from, so that we can make informed decisions

relating to improving our website and blogs and the services we deliver. This information is anonymous and does not identify a person.

When you visit our website a cookie is placed on your computer. The cookie does not contain personal information that can identify you, but may contain information about the page you visited on our website. If you do not wish for this to occur, you can remove cookies from your computer, by following the standard procedures applicable to your internet browser.

When you visit our website, our Internet Service Provider automatically records the following information about you for statistical purposes:

- your server address;
- the website you visited immediately prior to ours;
- your domain name;
- date and time of your visit to our website;
- pages you accessed and the information or documents you downloaded; and
- type of browser you used.

*Emails:*

We encourage the use of email communication to increase efficiency in communications. Emails sent to or by us are routinely monitored by our information technology staff for systems administration, quality control and compliance purposes.

We will only record your email address if you send an email to us. Email enquiries will be passed to the most appropriate staff member, who will be asked to respond to you directly.

*Online Subscriptions:*

If you wish to subscribe to any online information service which we may offer on our website from time to time, you will need to supply us with the following personal information:

- full name;
- email address;
- areas of interest and / or care required;
- nearest practice;
- mobile telephone number; and
- date of birth.

We will use this data to send information and publications to you via email. If you are included on a group email mailing list for this purpose, we will send you the information in such a way that your email address will not be visible to other mailout recipients.

**How you may access or seek the correction of personal information held by us [APP 1.4(d)]**

We are committed to keeping our records up-to-date, and we encourage you to tell us when your details (such as your telephone number, address or name) change.

You can request access to the personal information we hold about you if you wish to do so. If we are unable to provide you with access, we will explain why. We also reserve our rights to charge a fee for searching for and providing access to your information. We will require the presentation of personal identification before providing such information.

You may contact our office using the contact details available at our website [www.1300smiles.com.au](http://www.1300smiles.com.au) or by written request forwarded to:

1300SMILES Ltd  
Attention: Corporate Services Coordinator  
PO Box 5021  
Townsville QLD 4810

If you no longer wish to receive marketing and promotional material from us, or if you have previously asked to be added to our mailing list and have since changed your mind, please contact our Corporate Services Coordinator, and we will remove your details from our mailing list. Normally, our records are amended within thirty (30) days.

#### **How you may complain about a breach of the APP's by us [APP 1.4(e)]**

If at any stage you feel we have breached the APP's in our collection, use, disclosure, storage, security, management or disposal of your Personal Information, you may lodge a complaint with our Corporate Services Coordinator using the contact details available on our website [www.1300smiles.com.au](http://www.1300smiles.com.au).

We are committed to protecting your privacy and as such we treat all complaints very seriously. Our Corporate Services Coordinator will address your concerns with our legal department and contact you to ensure you are satisfied with our proposed resolution. If we do not respond to you within 30 days or you are not satisfied with our response, you are entitled to lodge a "Privacy Complaint Form" with the Office of the Australian Information Commissioner. Copies of this form and details relating to lodgement are available at [www.oaic.gov.au/privacy/making-a-privacy-complaint](http://www.oaic.gov.au/privacy/making-a-privacy-complaint).

#### **Our Disclosure of Your Personal Information to Overseas Recipients [APP 1.4(f)] and Countries in Which Overseas Recipients Likely to be Located [APP 1.4(g)]**

We may be required to disclose your Personal Information to overseas recipients. For example, we may from time to time rely upon the services of laboratories and other dental related suppliers located overseas in order to assist in the preparation of documentation which may contain your Personal Information. We currently rely on laboratory services located in Hong Kong, China and India. Whilst we take exceptional care in ensuring your Personal Information is kept secure in these instances, you may at any time ask we do not rely upon laboratory services and other dental related suppliers located overseas for the purposes of your matter by written request.

#### **Changes to this Policy**

From time to time, it may become necessary for us to review or amend this policy. Any changes will be made as and when required, and we will advise you of any changes by posting an updated version of this policy on our website, [www.1300SMILES.com.au](http://www.1300SMILES.com.au). An up-to-date copy of this policy will be available in hard copy at all times at each of our offices.