

# WARRAGUL FAMILY MEDICINE

## PRIVACY POLICY

Last Updated: 19 November 2025

### Introduction

Here at Ramjan Health Services Pty Ltd ABN 75 634 732 308 (trading as Warragul Family Medicine) (referred to as “we”, “us”, or “our”), protecting your privacy and handling your personal information in compliance with Australian privacy law is fundamental to our practice.

This Privacy Policy outlines what personal information we collect, the reasons for its collection, and how we manage, use, disclose, store, and protect it when you visit our website at <https://www.warragulfamilymedicine.com.au/> (**the Website**), engage with our medical services, or interact with us in any other capacity (**the Services**). As a dedicated healthcare provider, we are committed to upholding the highest standards of privacy protection, particularly for sensitive health information.

This Privacy Policy also explains your rights to access, correct, or request the deletion of your personal information and how to make a complaint if you have concerns about our handling of your information. We operate in full compliance with the *Privacy Act 1988 (Cth)* (**the Privacy Act**) and the Australian Privacy Principles (**APPs**) contained within that Act.

We maintain secure and diligent records of all patient consents and withdrawals to ensure we meet our regulatory obligations and respect your privacy choices throughout your healthcare journey with us. These records are kept for the duration of our relationship with you and for a reasonable period thereafter as required by applicable laws.

Unless otherwise indicated by the context, words importing the singular include the plural and vice versa.

### Changes to Our Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other operational reasons. We will notify you of any significant changes by updating the “Last Updated” date at the top of this Privacy Policy and posting the revised version on our Website. You are encouraged to review this Privacy Policy periodically to stay informed of any updates.

For any changes that materially affect how we process your personal information, particularly regarding sensitive health information or our information sharing practices, we will seek your fresh consent where required by law. If you do not agree with the revised policy, you may choose to discontinue using our Services. However, we will continue to protect any information previously collected in accordance with the privacy policy under which it was collected.

### Third-Party Websites and Services

This Privacy Policy applies only to our practice, our Website, and the Services we provide. It does not extend to third-party services or websites to which we may link or refer, including payment processors, health insurance providers, or other healthcare practitioners who may be involved in your care. We are not responsible for the privacy practices of these third parties and strongly encourage you to review their individual privacy policies before providing them with your personal information.

Our Website includes a contact form that collects names, email addresses, and other contact details for the purpose of responding to patient enquiries. Any information submitted through this form is managed in accordance with this Privacy Policy and is used solely for the purpose of responding to your enquiry. We also use Health Engine for online appointment booking, and we encourage you to review their privacy policy.

### **Which Entities Does This Privacy Policy Cover?**

This Privacy Policy applies to Ramjan Health Services Pty Ltd (trading as Warragul Family Medicine) with respect to all content on our Website, our medical services, and any information you provide to us about yourself through any of our service delivery channels, including in-person consultations, telephone communications, and electronic correspondence.

### **What is Personal Information?**

Personal Information is defined under the Privacy Act as information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. This includes:

- information from which your identity is apparent or can be reasonably ascertained; or
- information that, when combined with other information to which we have or are likely to have access, can identify you.

Personal information encompasses general details such as your name, address, telephone number, email address, and date of birth.

Sensitive Information is a special category of personal information that is afforded a higher level of protection under the Privacy Act. Under the Privacy Act, sensitive information is defined to include information about an individual's health, genetic information, biometric information, racial or ethnic origin, political opinions, religious beliefs or affiliations, sexual orientation, and criminal record.

As a general practice, a significant portion of the information we collect about our patients is classified as sensitive health information, which includes information about your medical history, diagnoses, treatments, medications, and other health-related matters.

### **When and How Do We Collect Your Personal Information?**

We collect most personal information directly from you when you consent to use our Services or receive communications from us. We may also collect information from third parties, such as your treating general practitioner, specialist medical practitioners, diagnostic imaging services, or other health services involved in your care. Your consent for this collection may be:

#### *Express consent*

Given explicitly, either orally or in writing, through an affirmative and unambiguous act, such as completing and signing our patient intake forms or a release of records form.

#### *Implied consent*

Inferred from the circumstances and your conduct, such as when you provide us with a referral letter from another practitioner or agree to terms and conditions that contain information about the use or disclosure of your information.

You provide us with your information when you:

- Complete patient intake forms or registration documents
- Attend consultations and treatment appointments
- Communicate with our team via telephone, email, or our Website contact form
- Provide consent for us to obtain information from other healthcare providers
- Provide consent for us to access your MyHealthRecord
- If you are an applicant for a job or a student or trainee on placement at our practice, when we consider your job application or when you commence your placement with us
- Engage with us in any capacity related to your medical care.

When we collect your personal information, we will take reasonable steps to notify you (or ensure you are aware) of the purposes for which we are collecting it, the parties to whom we may disclose it, and how you may access or seek correction of that information. This notification may be provided through our intake forms, via our Website, or verbally during your consultation.

### **What Personal Information Do We Collect?**

#### *Personal Information*

We collect and process various types of personal information, including sensitive personal information, that is necessary for providing our medical services. When we collect Sensitive Information, we implement additional safeguards to protect this information, including enhanced security measures, stricter access controls, and specialised handling procedures in compliance with applicable laws and regulations.

The types of personal information we collect include:

#### *Collection Methods*

Our practice employs both digital and paper-based collection methods to ensure comprehensive and accurate record-keeping. We collect personal information directly from patients through intake forms (both paper and electronic), during face-to-face and telehealth consultations, via telephone communications, publicly available information about you, and through our Website enquiry form. We may also collect information from third parties such as general practitioners, specialist practitioners, or other health professionals involved in your care, always with appropriate consent.

Disclosure of your information to third parties will generally occur with your explicit consent, which may be documented via a signed release of records form (with authorisation saved in your patient file) or through a note in your file if verbal consent is given during a consultation.

### **Voluntary Nature of Providing Information**

You can choose not to provide us with your personal information. However, please note that if you do not provide the information we request, you may not be able to take full advantage of our services, and we may not be able to provide you with safe and effective medical care. It is important to understand that the provision of personal information is voluntary, and you have the right to withdraw your consent at any time by contacting us using the contact details provided in this Privacy

Policy. However, withdrawal of consent may significantly impact our ability to provide certain services, particularly those requiring comprehensive medical information for safe and effective care delivery.

### **Why Do We Collect Your Personal Information?**

We may collect your personal information when required by law, but generally we collect personal information from you (or about you) to enable us to provide you with our medical services and to ensure your experience with us is positive, safe, and therapeutically beneficial.

The primary purposes for which we collect, hold, use, and disclose your personal information include:

#### *Service Provision*

To provide you with medical assessment, diagnosis, treatment planning, and ongoing clinical care.

#### *Care Planning and Coordination*

To develop comprehensive treatment plans tailored to your individual needs and to coordinate your care with other healthcare providers, such as your general practitioner or specialist practitioners.

#### *Billing and Payment Processing*

To process payments, submit claims to Medicare or private health insurers on your behalf, and manage your account.

#### *Appointment Management*

To schedule, confirm, and send reminders for your appointments via SMS, email, or telephone.

#### *Compliance and Reporting*

To comply with our legal and professional obligations, including mandatory record-keeping requirements under healthcare regulations and responding to lawful requests from regulatory bodies or government agencies.

#### *Quality Improvement and Research*

To conduct clinical audits, quality assurance activities, and research to improve our services and contribute to the advancement of medical care. In these cases, we take reasonable steps to de-identify your information.

#### *Job Applicants, Trainees and Students*

To assess your suitability for the position for which you have applied and to retain this information for future recruitment opportunities and in the case of trainees and students to ensure quality and safety of clinical care and our insurance and legal obligations.

#### *Staff Training and Professional Development*

To provide training to our staff and for case presentations at professional development forums, always with appropriate de-identification or your explicit consent.

Personal information collected or received by us will only be used for the stated purpose for which it was provided, or for purposes that are directly related to the primary purpose of collection and would be reasonably expected by you in the circumstances. We may also use de-identified information for quality assurance, staff training, research, and administrative purposes.

We will never sell, rent, or trade your personal information to third parties for marketing purposes or for any other benefit, service, or advantage.

### **When and To Whom Do We Disclose Your Personal Information?**

We may collect, hold, use, and disclose your personal information for the purposes described in this Privacy Policy. We maintain strict consent protocols for all information sharing, recognising the sensitive nature of health information and the critical importance of maintaining patient confidentiality while ensuring comprehensive and coordinated care.

We may disclose your personal information to the following parties:

#### *Our Employees and Related Bodies Corporate*

Our clinical and administrative staff who require access to your information to perform their duties in relation to your care.

#### *MyHealthRecord*

If you participate in the MyHealthRecord program, we may upload personal information to this program unless you ask us not to.

#### *Healthcare Providers*

Other healthcare practitioners involved in your care, including your general practitioner, specialist practitioners, and allied health professionals. This disclosure is done with your consent, typically documented via a release of records form, and is essential for coordinated and comprehensive care.

#### *Third-Party Service Providers*

Suppliers and service providers who support the operation of our practice, including our practice management software provider (Best Practice), IT support services, cloud storage providers, and administrative service providers. These parties are contractually bound to maintain the confidentiality and security of your information and to use it only for the purposes for which it was disclosed.

#### *Payment Systems Operators*

Merchants, banks, and payment processors for the purpose of processing payments and managing billing arrangements.

#### *Health Insurers and Medicare*

Private health insurance funds and Medicare for the purpose of processing claims and verifying entitlements.

#### *Responsible Persons*

Parents, guardians, or other responsible persons where you are a minor or lack the capacity to provide consent.

### *Government Agencies and Regulatory Bodies*

Law enforcement agencies, courts, tribunals, and regulatory bodies where required, authorised, or permitted by law.

### *Legal and Professional Advisers*

Our lawyers, accountants, auditors, and other professional advisers where necessary for the conduct of our business or to protect our legal rights.

### *Successors and Assigns*

Anyone to whom our assets or business (or any part of them) are transferred, in which case your information will continue to be protected under the terms of this Privacy Policy.

### *Other Authorised Parties*

Specific third parties authorised by you to receive information held by us.

### **Third-Party Information Sources and Healthcare Provider Relationships**

Our practice receives information from various third-party sources that are essential for providing comprehensive medical care. We maintain rigorous consent protocols for all third-party information sharing, recognising the importance of care coordination while protecting patient privacy.

We receive clinical information from:

#### *Specialist Medical Practitioners*

Who provide diagnostic reports, treatment recommendations, surgical reports, and other relevant clinical information.

#### *General Practitioners*

Who provide medical histories, current treatment plans, referral letters, and clinical summaries that inform our assessments and treatment planning.

#### *Diagnostic Imaging and Pathology Services*

Who provide radiographs, scans, and other diagnostic images and test results.

#### *Other Healthcare Practitioners*

Including allied health professionals, and other specialists involved in your care.

We may provide information to or receive information from these healthcare practitioners to ensure that all parties involved in your care have access to relevant clinical information. All such communications are properly authorised (either through your express or implied consent) and documented in your medical record.

## **Your Rights About Your Personal Information**

You have certain rights regarding the personal information we process about you. In particular, you have the right to:

- Where you have previously given your consent to the processing of your personal information, you have the right to withdraw that consent at any time. Please note that withdrawal of consent may impact our ability to provide certain services to you.
- You have the right to learn whether your personal information is being processed by us, obtain disclosure regarding certain aspects of the processing, and obtain a copy of the personal information undergoing processing.
- You have the right to verify the accuracy of your personal information and request that it be updated or corrected if it is inaccurate, out-of-date, incomplete, irrelevant, or misleading.
- Under certain circumstances, you have the right to obtain the erasure of your personal information from us, subject to legal retention requirements.

## **Access to Your Information**

You have the right to request access to the personal information we hold about you. We will provide you with access to your personal information within a reasonable period of receiving your request, generally within 30 days, unless there are exceptional circumstances that require additional time for processing. We will notify you if additional time is required and provide you with an explanation.

We provide access to information in a format that is readily understandable and, where possible and reasonable, in the format you have requested (such as electronic copies or paper copies).

We may refuse to give you access to personal information in certain circumstances permitted under the Privacy Act, including where:

- Giving access would pose a serious threat to the life, health, or safety of any individual, or to public health or public safety.
- Giving access would have an unreasonable impact on the privacy of other individuals.
- The request is frivolous or vexatious.
- The information relates to existing or anticipated legal proceedings between us and you, and the information would not be accessible by the process of discovery in those proceedings.
- Giving access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations.
- Giving access would be unlawful.
- Denying access is required or authorised by or under an Australian law or a court or tribunal order.
- We have a reasonable belief that there is an ongoing or potential unlawful activity or serious misconduct that could be impacted detrimentally by granting access.

If we refuse to give you access to your personal information, we will provide you with written reasons for our refusal, unless doing so would be unreasonable in the circumstances. We will also take reasonable steps to give you access in a way that meets your needs without giving rise to the reasons for our refusal. Furthermore, we will provide you with details of how you may make a complaint about our decision.

### **Correction of Your Information**

You have the right to request correction of personal information we hold about you if you believe it is inaccurate, out-of-date, incomplete, irrelevant, or misleading. Our team aims to update information within a reasonable timeframe of receiving your correction request, and we will confirm with you in writing once the corrections have been made.

If we refuse to correct your personal information as requested, we will provide you with written reasons for our refusal and information about how you can make a complaint about our decision. If you request, we will take reasonable steps to associate with the information a statement that you view it as inaccurate, out-of-date, incomplete, irrelevant, or misleading.

### **Deletion of Your Information**

You can request deletion of your personal information by contacting our Privacy Officer using the contact details provided at the end of this Privacy Policy. However, we are required by law to retain health information for specified minimum periods. Specifically, we must retain health records for a minimum of seven years from the date of your last attended appointment. For patients who were under the age of 18 at the time of their last appointment, we must retain records until they would have turned 25 years old.

When personal information is requested to be deleted, we will archive your patient profile while maintaining the clinical record for the required retention period in accordance with our legal obligations. There may be other circumstances where we cannot comply with deletion requests, such as where retention is required by law, where the information is necessary for legal proceedings, or where we have other legitimate grounds to retain the information.

### **How Long Do We Keep Your Personal Information?**

#### *Information Retention Periods*

As a healthcare provider, we maintain personal information in accordance with healthcare record retention requirements and our professional obligations under Australian healthcare regulations.

#### *Standard Retention Period*

We retain all clinical records and personal information indefinitely. For patients who were minors (under 18 years of age) at the time of their last treatment, we retain records until the patient attains or would have attained the age of 25 years.

Records of consent for information sharing, communications with healthcare providers, and other privacy-related decisions are maintained as part of the clinical record and are subject to the same retention periods. We are committed to regularly reviewing and updating our information retention periods to ensure ongoing compliance with legal requirements and best practices in information protection.

Subject to our obligations under Australian law and the obligations stated above, personal information shall be processed and stored for as long as required by the purpose for which it was collected. We ensure that personal information is minimised to what is necessary during the retention period and is securely deleted or anonymised when no longer needed. Personal information collected for the purposes of our legitimate interests shall be retained as long as needed to fulfil such purposes.

#### *Extended Retention*

We will retain personal information for a longer period if we are required to do so by law or by an order from a court, tribunal, or other legal authority. Exceptions to our standard retention periods may apply in cases of ongoing legal disputes, investigations, complaints, or other legitimate business needs that require extended retention. In such cases, we will retain the relevant information only for as long as necessary to fulfil these specific purposes.

#### *Secure Disposal*

Once the retention period expires and the information is no longer required for any legal, clinical, or business purpose, personal information is securely deleted or permanently de-identified through our information management systems. The right of access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

#### *Security of Your Personal Information*

We are committed to ensuring that the personal information we collect is secure and protected from misuse, interference, loss, and unauthorised access, modification, or disclosure. We take reasonable steps to protect your personal information using a combination of physical, administrative, personnel, and technical measures.

#### *Access Controls*

Access to patient records is limited to authorised personnel who require the information to perform their duties in relation to your care or the administration of our practice. Our practice management software, Best Practice, is configured with role-based access controls to restrict access based on job function. Access for GPs, the Practice Manager, Admin Staff, and Nursing Staff is set according to their roles. All access to patient information is logged and monitored to ensure accountability and prevent unauthorised access.

#### *Physical Security*

We maintain physical security measures to protect our premises and data storage facilities. Our practice has controlled access to the premises, with restricted entry to areas where patient information is stored. Personal information is stored in both secure electronic databases (including our practice management system Best Practice and cloud-based storage) and in paper files. All paper-based records containing personal information are stored in secure, lockable locations with restricted access. When paper records are no longer required, they are securely destroyed through shredding or other secure disposal methods, or are permanently de-identified.

#### *Staff Training and Confidentiality*

Our staff receive comprehensive training on privacy and confidentiality obligations to ensure they understand their responsibilities in protecting your personal information. All staff are bound by confidentiality agreements and receive training on privacy obligations during their induction, which includes a thorough review of this Privacy Policy and our internal privacy procedures. This ongoing

training ensures that all personnel remain current with privacy legislation, best practices, and our internal procedures for handling sensitive health information. Staff are also trained to recognise and respond appropriately to potential privacy breaches.

#### *Technical Security Measures*

Our electronic systems are protected by industry-standard security measures, including secure passwords, encryption for remote access, regular software updates and security patches, and secure daily backups. Our website uses a Let's Encrypt SSL certificate to protect data in transit.

#### *Limitations and Acknowledgements*

However, we cannot be held liable for events outside our reasonable control, including security breaches of third-party systems, internet infrastructure failures, or other circumstances beyond our reasonable control. We will take reasonable steps to maintain the integrity and security of any personal information we have stored, including taking reasonable steps to prevent interference and loss, misuse, unauthorised access, modification, or disclosure of such personal information.

Please note that no information transmitted over the internet can be guaranteed to be completely secure. While we will endeavour to protect your personal information to the best of our ability, we cannot guarantee the security of any information that you transmit to us or receive from us over the internet. The transmission and exchange of information is carried out at your own risk.

It is important that you also protect your privacy by ensuring that no unauthorised person obtains your personal information. You must contact us directly if your contact details or other personal information changes so that we can update our records. Should your information be erroneously provided to us, or should it no longer remain valid within the constraints of this Privacy Policy, we will securely destroy or de-identify it as soon as practicable, provided it is lawful to do so.

#### **Data Breach Notification**

We have obligations under the Privacy Act to notify you and the Office of the Australian Information Commissioner (OAIC) if you are affected by an eligible data breach. An eligible data breach occurs when there is unauthorised access to or disclosure of personal information, or a loss of personal information, that we hold, and this is likely to result in serious harm to one or more individuals.

We will take all reasonable precautions and implement remedial actions to prevent data breaches. However, as we cannot guarantee that remedial action will be sufficient to prevent all instances of a breach, we will take steps to notify you of an eligible data breach as soon as practicable after we become aware of it. We will provide you with recommendations as to what steps you should take to mitigate any potential serious harm resulting from the breach.

#### **Disclosure of Personal Information Outside of Australia**

Personal information is not routinely disclosed outside Australia. Our practice management software (Best Practice) and cloud storage systems store data on servers located within Australia, ensuring that your information remains subject to Australian privacy laws.

If overseas disclosure is required in specific circumstances (for example, if you move overseas and request that your records be transferred to an overseas practitioner, or if we require technical support from an overseas service provider), we will take reasonable steps to ensure that the overseas recipient complies with the Australian Privacy Principles or is subject to a law or binding scheme that provides substantially similar protections to those under the Privacy Act. We will seek

your consent before disclosing your personal information overseas, except where an exception under the Privacy Act applies.

### **Automated Decision Making and Technology-Assisted Services**

We inform you of the following automated systems and technology-assisted services that may be utilised in your care:

#### **Practice Management Automation**

##### *Communication and Reminder Systems*

We utilise automated systems for sending appointment reminders and administrative communications via SMS and email. These systems are designed to support your healthcare journey and ensure you receive timely information about your appointments and treatment. You may opt out of non-essential automated communications at any time by contacting us, while continuing to receive clinically important notifications that are necessary for your care.

##### *No Automated Clinical Decision Making*

We do not utilise automated systems, algorithms, or artificial intelligence for clinical decision-making, diagnosis, or treatment recommendations. All clinical decisions, treatment plans, and healthcare recommendations are made by our qualified general practitioners using professional clinical judgement, evidence-based medical principles, and consideration of your individual circumstances and preferences.

##### *Your Rights Regarding Automated Processing*

You have the right to request human review of any automated processes that affect you and to understand how these systems operate in relation to your care. We will provide additional information about our automated systems upon request and ensure that you maintain control over automated communications and processes that affect your healthcare experience.

##### *Website and Digital Platform Privacy*

Our Website (<https://www.warragulfamilymedicine.com.au/>) includes a contact form that collects personal information, including your name, email address, and the content of your enquiry, for the purpose of responding to enquiries about our services. This information is used solely for responding to your enquiry and is subject to the same security and privacy protections as all other personal information collected by our practice.

We use Health Engine for online appointment booking. We encourage you to review their privacy policy to understand how they handle your personal information.

#### **Cookies and Tracking Technologies**

Our Website may use cookies and similar tracking technologies to improve user experience and analyse website traffic. Cookies are small text files that are placed on your device when you visit our Website. We use limited technical cookies for admin login. You can control the use of cookies through your browser settings. Please note that disabling cookies may affect the functionality of our Website.

## **Digital Communications**

We utilise secure digital communication channels for appointment confirmations, cancellations, and reminders via SMS and email. These communications are generated through our practice management system and are subject to our standard privacy protections and security measures. If you prefer not to receive communications via SMS or email, please inform our reception staff, and we will make alternative arrangements.

## **Complaint Procedures**

If you have concerns about how we have handled your personal information, or if you believe we have breached the Privacy Act or the APPs, you may lodge a complaint with us by contacting our Privacy Officer using the contact details provided at the end of this Privacy Policy.

We take all privacy complaints seriously and will investigate all complaints promptly and thoroughly. Our complaint handling process includes:

- We will acknowledge receipt of your complaint within 7 days of receiving it.
- We will conduct a thorough investigation of the matter by appropriate personnel, which may include consultation with relevant staff members and service providers where necessary.
- We will provide you with a written response outlining our findings and any corrective actions taken or proposed within a reasonable timeframe, typically within 30 days of receiving your complaint. If we require additional time to investigate complex matters, we will notify you and provide you with an estimated timeframe for our response.

If you are not satisfied with our response to your complaint, you have the right to contact the Office of the Australian Information Commissioner, which is the Australian Government agency responsible for privacy regulation. You may also have rights to seek review through other regulatory bodies or legal proceedings as appropriate to your circumstances.

## **Contact Information**

### *Enquiries, Requests, and Complaints*

For all privacy-related enquiries, access requests, correction requests, complaints, or concerns about how we handle your personal information, please contact our designated Privacy Officer:

Privacy Officer: Jo Fishwick

Practice Name: Ramjan Health Services Pty Ltd T/A Warragul Family Medicine

Email: [practicemanager@warragulfamilymedicine.com.au](mailto:practicemanager@warragulfamilymedicine.com.au)

Phone: (03) 5622 2973

Address: 77 Victoria St, Warragul VIC 3820

ABN: 75 634 732 308

We are committed to responding to all privacy-related communications promptly and professionally.

If you believe your personal information held by us may have been compromised in any way, or if you have any other privacy-related complaints or issues, you should raise the matter with our Privacy Officer using the contact details above.

**Office of the Australian Information Commissioner**

If we do not resolve your enquiry, concern, or complaint to your satisfaction, or if you require further information in relation to any privacy matters, please contact the Privacy Commissioner of Australia:

Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Office Address: Level 3, 175 Pitt Street, Sydney NSW 2000

Postal Address: GPO Box 5218, Sydney NSW 2001

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

*Date of Current Version: 19 November 2025*

This Privacy Policy has been prepared to comply with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles. It should be read in conjunction with our Terms and Conditions of Service and other practice policies.