



## PRIVACY POLICY

Last updated: 21 March 2023

Quantum Radiology<sup>1</sup> (referred to as "**Quantum Radiology**", "**we**", "**us**" or "**our**") operates a network of medical imaging practices providing services for both diagnostic and interventional radiology and provides associated services.

The purpose of this privacy policy (**Privacy Policy**) is to inform you of how we will process your Personal Information and the measures and processes we have put in place to ensure its adequate protection. In the course of our business, we may need to gather and use information about you from which you can be identified or are reasonably identifiable, such as your name, and contact details (**Personal Information**). The Privacy Policy applies to all Personal Information that we collect in the course of our business. If you are an employee, this Privacy Policy should be read in conjunction with the Employee Handbook.

In receiving our services you consent to the collection, use, disclosure and transfer of your Personal Information as set out in this Privacy Policy.

In this Privacy Policy, by "**processing**", we mean the collection, recording, storage, use, disclosure and any other form of operations or dealings with your Personal Information.

### 1. TYPES OF INFORMATION COLLECTED

We only collect Personal Information to the extent that this is reasonably necessary for one or more of our functions or activities.

We collect the name and contact details (phone number, address, email) of patients, job applicants, employees, contractors, emergency contacts and others. Other Personal Information that we may collect includes, but is not limited to:

- (a) if you are a **patient**: your Medicare number, your date of birth, health-related information that is shared with us directly by you or via referral, health-related information that is collected during the course of us providing you with our services, information about your medical history, clinical notes, insurance or health fund information, and information about your demographic;
- (b) if you are an **employee**: information relevant to work performance, work experience, qualifications, aptitude test results, details of the work you have performed, your tax file number, and other employment related information;
- (c) if you **apply for a role with us**: your qualifications, experience, your curriculum vitae, your education and employment history.

We may also collect other information relating to you from third parties, including if a patient provides us with your information (e.g. to list you as an emergency contact) or from medical practitioners who refer you to our services.

Given the nature of our services, it is likely that we will collect Sensitive Information about you in the course of performing our services. In particular, we cannot provide services to our patients without collecting their health information. "**Sensitive Information**" includes health information and information about a person's racial or ethnic origin, political or

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<sup>1</sup> Community Imaging Employment Pty Limited, Planck Holdco Pty Limited and its associated entities trading as Quantum Radiology.



philosophical beliefs or affiliations, trade or professional affiliations, sexual preferences or practices, or criminal record. We do not collect Sensitive Information unless it is provided by you or a third party.

## 2. **METHOD OF COLLECTION**

Our preference is to collect Personal Information about an individual directly from that individual unless it is unreasonable or impracticable for us to do so.

Information will generally be collected from the following sources:

- (a) **directly from you**, including through your other interactions with us (e.g. by phone, email or in person) and, if you are an employee, via the Quantum Radiology application process, submitting resumes, and providing information through Kronos;
- (b) from **services we perform**, including conducting imaging studies and reviewing medical history or clinical notes;
- (c) **your Australian Government 'My Health Record'**, where you have a 'My Health Record' and permit us to access that record;
- (d) from **third parties** (including medical practitioners and other health care providers) in connection with the provision of our services, including third parties providing referrals for you to receive our services; and
- (e) if you are an employee or apply for a role with us, from **human resource processes**, including when we complete reference checks, we receive the results of any competency or medical tests, we receive any performance feedback, we receive information about a workplace accident or incident in which you are involved, or we receive information in relation to vaccination status.

You may wish to provide us with Personal Information concerning other individuals when you receive our services. If you provide us with information about any other individual, where reasonably practicable, you must obtain that person's consent to give us the information and inform them of this Privacy Policy.

## 3. **PURPOSES OF COLLECTION, USE AND DISCLOSURE**

We collect, use and disclose your Personal Information to provide you with our services, to operate our business and to comply with applicable laws. Other purposes for which we may collect, use or disclose your Personal Information include:

- (a) **providing you with our services**, including receiving or providing referrals with medical history and clinical notes; producing and managing medical imaging reports and appropriate testing; interpreting results and images; and releasing results to referring doctors and other medical practitioner involved in your care;
- (b) **communicating with you**, including communicating with you about our services (including for direct marketing as further described below); and responding to any enquiries, questions, requests or complaints that you have made;
- (c) to enable **medical practitioners and other health care providers to provide you with their services**, including where they have referred you to our services; or are providing your with medical or other health services that are related to our services;



- (d) **updating your 'My Health Record'**, to include imaging reports and results from our services, where you have a 'My Health Record';
- (e) **operating our business**, including the management of our business, providing transcripts of doctors' notes to off-shore typing companies for transcription to your medical file; and to provide training to our staff;
- (f) **for administrative and security purposes**, including for administrative purposes in relation to confirming your identity; for fraud and crime prevention and detection purposes; for the safety of any individual; for billing and to recover any payments due to us and enforce such recovery through engagement of debt collection agencies; and in connection with the acquisition, merger or sale of any part of our business or our acquisition of, merger with, or purchase of any other business;
- (g) **complying with applicable laws**, including to comply with our legal and regulatory obligations and requests anywhere in the world; to comply with reporting and/or auditing obligations imposed by national and international regulatory bodies; and to comply with court orders and exercise and/or defend our legal rights;
- (h) if you are an employee, **human resource purposes**, including to conduct performance appraisals, tests or assessments that might be required; to identify training needs; for any workplace rehabilitation plan or program; to investigate any complaint; in relation to any insurance matter that requires disclosure of personal or sensitive information; and for other purposes related to your employment; and
- (i) **any other lawful purposes**, including for any other purpose that you have consented to; to lessen or prevent a serious threat to life, health or safety; for any other legitimate business purpose; and as otherwise permitted or required by any applicable law or regulation.

If you do not provide us with the required Personal Information, we may not be able to provide you with our services or respond to referrals.

#### 4. **DIRECT MARKETING AND OTHER COMMUNICATION FROM US**

We do not use your personal information to engage in any direct marketing.

#### 5. **WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?**

We do not and will not sell, rent out or trade your Personal Information. We will only disclose your Personal Information in the ways set out in this Privacy Policy and, in particular, to the following recipients:

- (a) to any **member of Quantum Radiology and its related entities**, including their respective employees, officers, insurers, professional advisers, agents, and contractors;
- (b) to **third parties who process your Personal Information on our behalf**, such as our systems providers, cloud service providers, debt collection agencies, document management systems, external advisors, off-shore typing companies for transcription services and other third parties that we partner with in delivery of our services;
- (c) to **medical practitioners and other health care providers who are providing your with related services** (for example: general practitioners, specialists, hospitals, physiotherapists, chiropractors, osteopaths, podiatrists, dentists, or



nurses), including the medical practitioner or health care provider who referred you to our services; and other medical practitioners and health care providers who are providing you with medical services;

- (d) to a **person who is responsible for you** (such as a parent or guardian), where we believe it is reasonably necessary to provide appropriate care and is not contrary to any wish that you have expressed;
- (e) to **your insurer, insurance brokers or health fund**, to claim a rebate or payment for our services on your behalf;
- (f) if you are an employee, to **parties for the purpose for which information was collected**, including to workers compensation bodies or insurers, any person with a lawful entitlement to obtain the information; registered training organisations for the purpose of pre-vocational training and up skilling; and Government Employment Services Australia contractors and sub-contractors;
- (g) to any **third party to whom we assign or novate** any of our rights or obligations;
- (h) to any **prospective buyer** in the event we sell any part of our business or assets;
- (i) to any **government, regulatory agency, enforcement or exchange body or court** where it is relevant to making a claim or providing you with a service (for example, Medicare or WorkCover); or where we are required to do so by applicable law or regulation or at their request; and/or
- (j) to **other persons or bodies**, to the extent required by applicable law or regulation.

## 6. **STORAGE OF DATA AND OVERSEAS DISCLOSURE**

We, including our subcontractors, may hold electronic records of your Personal Information using cloud technology or by other electronic means, or in paper form. These means of holding Personal Information may include offshore storage.

There is the potential for Personal Information to be shared outside of Australia. Your Personal Information may be stored or otherwise processed in locations including the Philippines. It is not practicable for us to specify in advance the location of every service provider with whom we deal.

## 7. **HOW LONG WILL WE HOLD YOUR PERSONAL INFORMATION FOR?**

We will only retain your Personal Information for as long as reasonably necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. We will also take steps as are reasonable in the circumstances to destroy or de-identify Personal Information as soon as reasonably practicable once we no longer need it for any purpose for which the information may be used, disclosed or retained for the purposes described in this Privacy Policy (including to comply with legal, regulatory or internal policy requirements).

We may be required to retain your Personal Information to comply with applicable laws, including where you are a patient and we have collected your health information or where you are employee.



## 8. **COOKIES**

We may from time-to-time use cookies or other trackers on our websites or applications (**Cookies**).

Most web browsers and applications automatically accept Cookies, but you can choose to reject Cookies by changing your browser settings. Certain Cookies may be required to enable core site functionality (**Necessary Cookies**). If you wish to use our websites or applications, you cannot opt-out or choose to disable Necessary Cookies.

If you do not agree to the use of Cookies, please disable them by following the instructions for your browser or device or using the automated disabling tool where available. However, if you disable any Cookies, you will not be able to take full advantage of our website or application.

## 9. **CHANGES TO OUR PRIVACY POLICY**

We may change or update parts of this Privacy Policy, including to maintain our compliance with applicable laws and regulations or following an update to our internal practices. We will do this by updating this Privacy Policy on our website at <https://www.quantumradiology.com.au/patients-rights-and-privacy/>. You may obtain a copy of our current notice from our website or by contacting us via the details in paragraph 12.

Except where required by law, you may not be directly notified of changes to this Privacy Policy. Please ensure that you regularly check this Privacy Policy, so you are fully aware of any changes or updates.

## 10. **ACCESS, CORRECTION AND FURTHER INFORMATION**

We will take such steps as are reasonable in the circumstances to ensure that the Personal Information which we collect remains accurate, up to date and complete.

We will provide you with access to your Personal Information held by us unless we are permitted under the applicable privacy and data protection laws to refuse to provide you with such access. Please contact us via the details in paragraph 12 if you:

- (a) wish to have access to the Personal Information which we hold about you;
- (b) consider that the Personal Information which we hold about you is not accurate, complete or up to date; or
- (c) require further information on our Personal Information handling practices.

There is no charge for requesting access to your Personal Information but we may require you to meet our reasonable costs in actually providing you with access.

If you consider that the information which we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps, consistent with our obligations under the applicable privacy and data protection laws, to correct that information if you so request.

We will respond to all requests for access and/or correction within a reasonable time.



11. **COMPLAINTS**

If you have a complaint or inquiry about the way in which we have handled any privacy issue, please advise us via the details in paragraph 12. We will use reasonable efforts to deal promptly with complaints and inquiries and, in any event, acknowledge your complaint or inquiry within 30 days.

If you are not satisfied with how we manage your complaint, you may contact the Office of the Australian Information Commissioner, which can be contacted at GPO Box 5218 Sydney NSW 2001 or [oaic.gov.au](http://oaic.gov.au).

If you are not satisfied with how we manage complaints relating to health information in NSW, you may contact the Information and Privacy Commission NSW, which can be contacted at GPO Box 7011, Sydney NSW 2001 or [www.ipc.nsw.gov.au](http://www.ipc.nsw.gov.au)

12. **CONTACT INFORMATION**

You may contact us about our privacy practices:

<b>Name:</b>	Antony Clarke (Privacy Officer)
<b>Phone:</b>	+61 (0)2 9055 7003
<b>Email:</b>	<a href="mailto:aclarke@quantumradiology.com.au">aclarke@quantumradiology.com.au</a>