

Privacy Policy

GMS Group (GMS Rehabilitation & Free to Smile) believes that the responsible handling of personal and health information is a key aspect of a professional business, and is strongly committed to protecting an individual's right to privacy. Accordingly, GMS Group is committed to full compliance with its obligations under the *Information Privacy Act* 2000 (Vic) (Privacy Act) In particular, GMS Group will comply with the Information Privacy Principles contained in the Acts. This Privacy Policy explains some of these Principles and how they will apply.

**What is Personal and Health Information?**

This Policy applies to personal and Health information held by GMS Group.

**Personal Information** means information or an opinion, whether true or not, and however recorded in any form, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

For example, GMS Group holds personal information about its customers (eg. names and addresses) in order to carry out its functions (e.g. invoicing goods, delivery of goods and collection of moneys owed). It may also request personal information in order to provide education, or assist the client in product selection.

**Health Information** is broadly defined to include information or an opinion about the physical, mental or psychological health of an individual, a disability, or other information collected to provide or in providing assessment of product selection or recommendation.

For example, GMS Group holds health information on its clients as part of an assessment process, and this information may be used to assist in quotations to allied health professional also involved in the assessment process.

Some personal information may also be "sensitive information" as defined in the Privacy Act. GMS Group usually has no need to collect sensitive information but may at times be aware of sensitive issues but usually keeps no records of such information.

**What information will GMS Group collect?**

GMS Group will only collect personal and health information that is necessary for its functions and activities and in doing so will use lawful and fair means. GMS Group will only collect sensitive information where consent has been given or otherwise as permitted by law.

If it is reasonable and practicable to do so, GMS Group will collect personal and health information direct from the individual. When doing so, GMS Group will inform the individual of the purpose/s for which the information is collected. If GMS Group collects personal and health information about an individual from someone else, it will take reasonable steps to make the individual aware of these matters.

Individuals will have the option of not identifying themselves when supplying information or entering into transactions with GMS Group wherever it is lawful and practicable.

**How will the information be used?**

GMS Group will only use or disclose personal and health information for the purpose for which it was collected. GMS Group Staff will treat personal and health information confidentially. If GMS Group needs to share information for any other purpose than for which it was collected, agreement will be sought before doing so (unless otherwise required by law).

**How will information remain secure?**

GMS Group will maintain secure systems for storing personal and health information. GMS Group will also maintain operational policies and procedures to protect personal and health information from misuse and loss and from unauthorized modification or disclosure. GMS Group will destroy or de-identify personal and health information if it is no longer needed for any purpose or as required by law.

**What rights do individuals have to access or correct information?**

Individuals have a right to seek access to their personal and health information and make corrections. Access and correction will be handled under the *Victorian Freedom of Information Act.* Some limits may apply where particular circumstances prevent GMS Group from releasing information. If any limits apply this will be explained.

If personal and health information is inaccurate, incomplete, misleading or out of date, the individual may request GMS Group to correct this information.

Requests for access and/or correction of personal and health information, should be made to GMS Group's Privacy Officer on 1300 734 223

**What if GMS Group services are serviced by third party contractors?**

GMS Group does outsource some of its functions to third party contractors. All third party contractors will be required to comply with the Acts in all respects.

**How are complaints handled?**

Complaints in relation to privacy and confidentiality will be handled by GMS Group's Privacy Officer telephone: 1300 734 223. Complaints will be investigated and a written response will be provided as soon as possible (but no later than 45 days). If an individual is not satisfied with the way in which GMS Group handles information or deals with a complaint, a formal complaint can be made to the relevant Commissioner.

Victorian Privacy Commissioner

Phone: 8619 8719

Victorian Health Services Commissioner

Phone: 8601 5200

**Further Information**

Any enquiries about this Privacy Policy, should be directed to GMS Group's Privacy Officer telephone 1300 734 223

Effective Date: January 2011

Review Date: 2 Years after the date of publishing or where appropriate