

HealthLink Privacy Policy

27 September 2019

Document History

Document name	HealthLink Privacy Policy – HealthLink Policy
Document version	8.0
Author	Michelle Creighton
Summary of changes	Comply with updated legislation/standards/policies
Date previous version	7 March 2018
Contact	Michelle Creighton Chief Executive Email: michelle.creighton@healthlink.net Phone: +64 (9) 354 7276 Mobile: +64 21 313 452

Document approval

Signature



Name

Michelle Creighton

Position

Chief Executive

Date

27 / 9 / 2019

Copyright © HealthLink Group Limited 2019

All rights reserved. No reproduction, transmission, transcription, storage in a retrieval system, or translation into any language or by any means, electronic, mechanical, optical, chemical, manual, or otherwise, any part of this document without express written permission of HealthLink Group Limited.

Liability Notice

Every effort has been made to ensure that the information in this document, supplied by HealthLink Group Limited, is accurate and complete. However, as use and interpretation of this document is beyond the control of HealthLink Group Limited, no liability, either direct or consequential, can be entertained by HealthLink Group Limited, its agents, or its suppliers.

Contents

HealthLink Privacy Policy	3
Purpose	3
Introduction	3
Privacy Policy Statement	4
Governance - HealthLink	4
Collecting Personal Information	5
Cookies	6
Use and Disclosure of Information	6
Disclosure of Information Overseas	6
Third Parties and Your Information	6
Direct Marketing	7
Accuracy of Your Information	7
Your Consent	7
Storage and Security	7
Access to Information We Hold About You	8

HealthLink Privacy Policy

Purpose

The primary purpose of the Privacy Policy is to describe the ways in which HealthLink's employees and contractors (staff) will manage all aspects of patient privacy. It also covers HealthLink's efforts to meet the requirements of the New Zealand Health Information Privacy Code (1994), and the Australian Privacy Act (1988), and all other relevant standards and legislation.

This document is available to all HealthLink's customers and is used by staff as the basis on which management decisions regarding privacy policy are made.

Introduction

HealthLink is a world leader in the provision of health sector information services. From its bases in Auckland (New Zealand), Sydney and Townsville (Australia), HealthLink provides electronic communications services to more than 15,000 health sector organisations sited across New Zealand and Australia.

HealthLink has been operating in New Zealand since 1994 and in Australia since 1999. HealthLink provides a range of services, which include;

- Electronic messaging between healthcare providers
- Electronic claims processing systems
- Online referral and pathology ordering systems
- Disease management databases
- Access to government provided patient databases
- Managed online security services
- Provider portals

Every month HealthLink's systems handle more than six million items of patient information. The company is also responsible for the management and maintenance of a number of databases containing patient information.

It is noteworthy that all electronic messages sent across HealthLink's messaging systems are encrypted and digitally signed. This means that HealthLink staff cannot see the information within the messages.

On a daily basis HealthLink's staff handle enquiries regarding computer system malfunctions. These enquiries at times necessitate staff looking into computer records and studying the composition of computer files which can contain personally identifiable information. In order to ensure that patients' privacy is respected, all HealthLink staff are required to sign an undertaking that they will abide by the company's Privacy policy.

Privacy Policy Statement

HealthLink views New Zealand and Australian privacy legislation as the cornerstone of its business. HealthLink staff are required to demonstrate at all times that they understand the privacy of individuals and their medical information is of paramount importance.

HealthLink understands that confidential information is valuable, can be highly sensitive and is protected by law. The intention of the law is to ensure that confidential information remains confidential; in essence, that is, it will only be used as and when necessary to accomplish the resolution or purpose for which it was obtained.

Governance - HealthLink

HealthLink Group Limited (NZBN 9429030014619), HealthLink Group Pty Limited (ACN 600 665 183) and its related and associated bodies corporate (us, we, our) maintain a policy of strict confidence concerning your (you, your) personal information (Privacy Policy).

This Privacy Policy has been developed in accordance with the Privacy Act 1993 (NZ), the Health Information Privacy Code 2004 (NZ) and the Privacy Act 1988 (Cth) and any replacement or subordinate legislation (Privacy Law). The Privacy Policy applies to the collection, storage, use and disclosure by us of your personal information. By accessing this site www.healthlink.net (Site) you accept the terms of this Privacy Policy.

This Privacy Policy applies to information provided to us whether via this Site or any other means and demonstrates how we will comply with the applicable Privacy Law in your country. In addition, where we collect and hold information about you in accordance with a contract with a third party, we will also endeavour to comply with any additional rules as advised by that contracting party.

If you have any further questions or if you wish to receive more information on our information practices and Privacy Policy, please contact our Privacy Officer at privacy@healthlink.net.

Policy Compliance and Review

All HealthLink's policies are regularly monitored, reviewed and updated as required to ensure they remain relevant to all applicable international standards, laws and legislation, HealthLink's business aims and objectives, and in the event of the introduction of new or upgraded technology.

Compliance with the Privacy Policy and all other HealthLink policies is mandatory.

This policy is monitored for compliance by the Chief Executive (CE) and may include random and scheduled inspections.

Variation and Consent to Variation

We may vary the terms of this Privacy Policy at any time. You should check this Privacy Policy regularly so that you are aware of any variations made to this Privacy Policy. You will be deemed to have consented to such variations by your continued use of the Site following such changes being made.

Exceptions

Any exception to this policy or any other HealthLink privacy related policy must be approved by the CE in advance.

Additional Privacy Policies

Various HealthLink policies and documents are directly associated with this Privacy policy. Please contact the CE for further details.

Collecting Personal Information

The types of personal information we collect includes contact details such as name, email, phone and mailing address. If it is reasonable and practical to do so, we will collect personal information directly from you. This will include contact details and other information relevant to providing services. This may take place in a number of ways, such as when you attend our seminars, e-mail, otherwise contact us or if you subscribe to our publications.

We may also collect personal information from third parties such as your representatives or publicly available sources of information. All personal information that we or our related bodies corporate collect, is reasonably necessary for the purposes relating to providing our services. Those purposes include:

- providing our services to assist healthcare providers. Where we provide our services to our clients and they collect health and other information, we hold that information on their behalf pursuant to a contract. In such cases we will comply with the terms of our contractual arrangements with the clients;
- product development and analysis;
- communicating with you; and
- enhancing functionality of our Site, products and services.

If someone other than you provides us with personal information about you that we did not ask for and we determine that we could have collected this information from you had we asked for it, we will notify you, as soon as practicable. This notice will be given unless to do so would be in breach of an obligation of confidence. If we could not have collected this personal information, we will lawfully de identify or destroy that personal information.

We will not collect any sensitive information from you, revealing your: race, ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships or details of health or disability. Exceptions to this include:

- where we collect such information from healthcare providers as set out above.
- where you have given express consent to us to do so and the information is reasonably necessary for us to carry out our functions or activities;
- the use of this information is required or authorised under Australian or New Zealand law, or a court or tribunal order; or
- when the information is necessary for the establishment, exercise or defence of a legal claim.

We will not collect personal information unless the information is reasonably necessary for or directly related to one, or more of our functions or activities. If we are unable to collect personal information we reasonably require, we may not be able to do business with you or the organisation with which you are connected.

Cookies

When you visit the Site the server may attach a "cookie" to your computer's memory. A "cookie" assists us to store information on how visitors to the Site use it and the pages that may be of most interest. This information may be used to provide users of your computer with information that we think may interest the users of your computer. However, this information is not linked to any personal information you may provide and cannot be used to identify you. If you choose, you should be able to configure your computer so that it disables "cookies" or does not accept them.

Use and Disclosure of Information

We may use personal information about you for the primary purpose of providing our services, and for which you would reasonably expect us to use that information, including sending you information about new developments, products, services and special offers by post, telephone or any form of electronic communication. We may use any email address or other personal information you provide to us at any time for this purpose.

We will not disclose information that personally identifies you to any third party other than as set out in this Privacy Policy. In order to deliver the services that we provide, we may disclose your personal information to other organisations, only in relation to providing our services. We take reasonable steps to ensure that these organisations are bound by privacy obligations in relation to the protection of your personal information.

We may provide certain information about you including your personal information to our related bodies corporate.

In the event of a security incident involving unauthorised access, use or disclosure of personal information where a third party with whom we share personal information is involved, we will seek to work cooperatively with them to protect the personal information we have shared with them.

Disclosure of Information Overseas

We may transfer to people in foreign countries any of your personal information to fulfil the purposes set out in this Privacy Policy, for example to securely store information on remote servers. We consider these service providers are bound to legislation similar to the Privacy Laws and we have a contractual mechanism with them to enforce your rights.

Third Parties and Your Information

We will only collect, store, use or disclose personal information as set out in this Privacy Policy unless

we are required by law to protect our rights or property (or those of any third party), or to avoid injury to any person.

Although the Site may link directly to websites operated by third parties (Linked Sites), you acknowledge that Linked Sites are not operated by us. We encourage you to always read the applicable privacy Policy of any Linked Site on entering the Linked Site. We are not responsible for the content or practices of the Linked Sites nor their privacy policies regarding the collection, storage, use and disclosure of your personal information.

Direct Marketing

This part does not apply to health information we may collect when we provide our services to healthcare providers.

We may use personal information about you for the primary purpose of providing our services, and for other purposes for which you would reasonably expect us to use that information. This includes sending you information about new developments, products, services and special offers by post, telephone or any form of electronic communication. You authorise us to use any email address or other contact information you provide to us at any time for this purpose.

You can, at any time, opt out of receiving marketing material by contacting us. You agree and acknowledge that even if you opt out of receiving marketing material, we will still send you essential information that we are legally required to send you relating to the services we provide. Once you opt out of receiving marketing material from us, you agree and acknowledge that this removal from our distribution lists may take several business days after the date of your request to be removed.

Accuracy of Your Information

We take all reasonable steps to ensure that your personal information held by us is accurate, up-to-date, complete, relevant and not misleading. If you believe that any of your personal information is not accurate, up-to-date, complete, relevant or is misleading, please contact us (see below) and we will take all reasonable steps to correct it within a reasonable time.

Your Consent

By your use of the Site you consent to the collection, storage, use and disclosure of your personal information in accordance with this Privacy Policy and as otherwise permitted under the Privacy Act.

Storage and Security

We will use all reasonable endeavours to keep your personal information in a secure environment, however, this security cannot be guaranteed. HealthLink utilises the highest possible data security standards, as set out in the HealthLink Security Policy which is also available on the Site.

These security measures are designed to ensure your personal information is not subject to unauthorised access, loss or misuse. If you reasonably believe that there has been unauthorised use or disclosure of your personal information please contact us (see below).

If we no longer need your personal information, unless we are required under the relevant Privacy Law or a court or tribunal order to retain it, we will take reasonable steps to destroy or de-identify your personal information.

Notwithstanding the reasonable steps taken to keep information secure, breaches may occur. In the event of a security incident we have in place procedures to promptly investigate the incident and determine if there has been a data breach involving personal information, and if so, to assess if it is a breach that would require notification. If it is, we will notify affected parties in accordance with Privacy Act requirements.

Access to Information We Hold About You

If you request access to the personal information we hold about you, we will respond to your request in accordance with the relevant Privacy Law. You may request this information by sending an email to us at privacy@healthlink.net or writing to us at:

If you are in Australia:

Privacy Officer, HealthLink Group Pty Limited, PO Box PO Box 1736, Sydney, NSW 2001.

If you are in New Zealand:

Privacy Officer, HealthLink Group Limited, PO Box 9920, Newmarket, Auckland 1149.

We may charge a reasonable fee for providing that information.

New Zealand

Phone toll free: 0800 288 887

8.00am – 6.00 pm Monday-Friday
(NZST)

Australia

Phone toll free: 1800 125 036

8.00am – 6.00 pm Monday-Friday
(AEST)

Email: helpdesk@healthlink.net

www.healthlink.net

