



St Vincent's Health Network

Personal Information Collection Notice for THIS WAY UP®

1 Collection of Personal Information

St Vincent's Hospital Sydney Limited with respect to its facilities St Vincent's Hospital Sydney, Sacred Heart Health Service and St Joseph's Hospital (St Vincent's Health Network) must comply with all relevant Australian privacy legislation and is committed to protecting the privacy of the personal information including sensitive information which it collects and holds.

THIS WAY UP® is a joint initiative of the St Vincent's Health Network and the University of New South Wales (UNSW). By completing your enrolment with THIS WAY UP and using the THIS WAY UP program you are providing personal information to St Vincent's Health Network and UNSW.

2 How we collect your personal information

We generally collect your personal information directly from you for example through your use of the THIS WAY UP® Website and its associated mobile applications (Website), although there may be instances when we receive your personal information from someone else such as your clinician who will provide us with, among other things, your full name, email address and course recommendations. We collect sensitive information, which includes health information, only with your consent unless otherwise permitted by law, for example where it is impracticable to obtain your consent and the sensitive information is necessary for:

- (a) research relevant to public health,
- (b) the compilation or analysis of statistics relevant to public health; or
- (c) the management, funding or monitoring of health services.

We also collect your personal information through our use of cookies. A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors experience the Website. This information will help to better adapt the Website to suit personal requirements.

While cookies allow a computer to be identified, they do not contain personal information about a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

3 For what purposes do we collect your personal information

We may collect your personal information for a number of purposes, including:

- (a) to contact you;
- (b) provide health services and any ongoing related services to you, including education services and self-help learning;
- (c) to inform your clinician of your progress through the Website and courses, if you are a patient;
- (d) to provide you with marketing materials in relation to services we offer, including the circulation of a periodic newsletter and other support services;

- (e) to improve and evaluate our programs and services including information about your device, country location, referring domain, and pages visited (which may also be collected by a third party, for example Google Analytics);
- (f) recognise you as a provider of health care services (if you are a clinician);
- (g) to manage our relationship with you and to manage the payment and recovery of amounts payable to us by you;
- (h) appropriately manage our business, such as assessing insurance requirements, conducting audits, and undertaking accreditation processes;
- (i) assist us in running our health services business, including quality assurance programs, billing, improving our services, conducting research and training personnel, and implementing appropriate security measures;
- (j) effectively communicate with third parties, including the NSW Ministry of Health, Medicare Australia, private health insurers and Department of Health;
- (k) to comply with relevant laws; and
- (l) for other purposes which are reasonably necessary in connection with any of the above uses.

4 What happens if we don't collect your personal information?

It is your right not to give us any personal information and not to identify yourself to us. However, if you choose not to give us the personal information we request or do not wish to identify yourself to us, we may not be able to (to the extent applicable):

- (a) provide you with health services and any ongoing related services, including education services and self-help learning;
- (b) in respect to clinicians, recognise you as a provider of health care services, allow you to supervise and monitor your patients through the use of our service and provide you with the marketing and other materials provided in association with the THIS WAY UP® program and services offered by us.

5 Disclosing your personal information

We may provide your personal information to:

- (a) If you are a patient, third parties involved in your care, such as clinicians, including your supervising/prescribing clinician;
- (b) third party service providers and contractors who perform services on our behalf, including software development and maintenance providers;
- (c) any of the entities included in St Vincent's Health Network or St Vincent's Health Australia Group;
- (d) research institutions with which St Vincent's Health Network collaborates, such as UNSW;
- (e) subject only to the patient's consent or as required by applicable law, we may disclose personal information for billing and auditing purposes;
- (f) anyone authorised by you to receive your personal information (your consent may be express or implied);
- (g) anyone St Vincent's Health Network is required by law to disclose your personal information to.

When dealing with particularly sensitive personal information, such as your health information for a purpose that is not directly linked to the primary purpose of collection, we will generally seek your consent before using the health information. In only limited circumstances, for example where we are required by law to disclose information or in the event of a serious threat to your life or health, we will disclose your health information without your consent.

6 How do we protect your information

We have a range of technical, contractual, administrative, and physical security measures in place; we take reasonable steps to ensure your personal information is stored and managed appropriately and in accordance to our Collection Notice and privacy laws.

7 Disclosing Overseas

We may disclose personal information (such as your name/e-mail address used to register with THIS WAY UP) to external service providers (such as MailChimp for automatic email notifications and newsletters, and Cloudflare content delivery network and web security service) who may use, process and store that information overseas. Our overseas providers may not be subject to Australian privacy legislation. We take reasonable steps to ensure our overseas providers do comply with Australian privacy legislation but if the overseas provider mishandles your personal information our obligations under the relevant Australian privacy legislation may not apply. If you are using THIS WAY UP® from outside Australia personal information is likely to be disclosed overseas to the country where you or your clinician is based.

8 Access and Correction

The privacy policy for St Vincent's Health Network is accessible at <https://svhs.org.au/wps/wcm/connect/svhs/home/privacy-policy> and contains information about how you can access your personal information and seek correction of such information, as well as how to complain about a breach of the privacy policy or the Australian privacy legislation and how St Vincent's Health Network will deal with such a complaint

You can contact St Vincent's Health Network about any privacy issues as follows:

The Privacy Officer
St Vincent's Health Network
02) 8382 1111 (Hospital switchboard)
02) 8382 2250 (Executive Unit)

Last updated 12 September 2019