

Kaleido Health Centre - Privacy Disclosure Statement

Unique policy reference:	K-HIM-01a
Approved date:	July 2025
Review date:	July 2026
Applies to:	All: – clinical staff, non-clinical staff, peer workers, volunteers – contracted services, agents, suppliers
Policy Group:	Privacy & Personal Health Information
Related RACGP criteria:	Core Standard 3 – Practice Governance and Management (C3.6C) Core Standard 6 – Information Management (C6.3, C6.4B, C6.4C, C6.4D, C6.4E)
Related Standards/Legislation:	Privacy Act 1988 (Cth); Health Records and Information Privacy Act 2002 (NSW); Health Practitioner Regulation (NSW) 2016
Related policies/procedures:	K-HIM-01 Kaleido Privacy Policy K-PM-01 Complaints Management Policy K-HIM-02 Privacy and Management of client health information K-AHC-06 Confidentiality and Work Practices Agreement K-HR-01 Code of Conduct K-FIN-01 Delegations Policy
Replaces policy:	Nil

Version & Change History

Date	Description	Reason for Change	Author	Version
Mar 2025	First Draft	Initial development of statement based on RACGP Privacy Policy template and ACON Privacy Policy	Danielle French	V1.0
May 2025	Update to approved statement	Minor update to adjust AI scribe section in line with updated advice	Danielle French	V1.1

Endorsement and Approval

Approved by Interim CEO, Kaleido Health Centre	Signed:  Name: Michael Woodhouse Date: 28 July 2025
---	---

CONFIDENTIALITY STATEMENT

The content of this document is the confidential information of Kaleido Health Centre. It may not be reproduced, disclosed, or otherwise used in any form without authorisation by the CEO. The contents of this document may be disclosed only to persons with the "need to know" and who agree to be bound by obligations of confidentiality, or otherwise with consent from Kaleido Health Centre.

Table of Contents

1. Background	3
2. Purpose	3
3. Scope	3
4. Why and when your consent is necessary	3
5. Why do we collect, use, hold and share your personal information?	4
6. What personal information do we collect?	4
7. Dealing with us anonymously	5
8. How do we collect your personal information?	5
9. Storage of Information	6
10. When, why and with whom do we share your personal information?	6
11. Sharing information outside of NSW and Australia	6
12. Will your information be used for marketing and fundraising purposes?	7
13. How is your information used to improve services?	7
14. How are document automation technologies used?	7
15. How are Artificial Intelligence (AI) Scribes used?	7
16. Research	8
17. How is your personal information stored and protected?	8
18. How can you access and correct your personal information?	8
19. How can you lodge a privacy-related complaint, and how will the complaint be handled at Kaleido?	9
20. Privacy and our website	9
21. Policy review statement	10

Approved	Jul 2025	Reference	K-HIM-01	Version	V1.1	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	-----------	----------	---------	------	-------------------------	---

KALEIDO HEALTH CENTRE – PRIVACY DISCLOSURE STATEMENT

1. Background

The objective of this privacy statement is to provide you, our client, with clear information on what personal information is collected/held by us, how your personal information (which includes your health information) is collected and used within Kaleido Health Centre (“Kaleido”), and the circumstances in which we may share it with third parties, in accordance with the Privacy Act 1988 (Cth) (the “Act”) and the Australian Privacy Principles ('APPs') contained in the Privacy Act.

The APPs set out the way organisations such as Kaleido can collect, use, disclose and provide access to personal and sensitive information. Kaleido complies with and, wherever possible, strives to exceed the requirements of the Act and complies with all of APPs.

Kaleido may, from time to time, review and update this Privacy Statement and our Privacy Policy to take account of new laws and technology, changes to Kaleido's operations and practices and to make sure it remains appropriate to the changing legal environment.

2. Purpose

This statement outlines Kaleido's policy on how the Kaleido uses and manages personal information provided to or collected by it.

This policy is designed to communicate to our clients how we manage personal information and to complement our other policies, such as our Complaints Management policy (K-PM-01) and Information Security and Management policy (K-HIM-08).

For more information on privacy, please visit www.oaic.gov.au

For enquiries concerning this policy, you can contact manager@kaleidohealth.com.au.

3. Scope

This policy statement covers:

- Kaleido procedures
- staff responsibilities
- client consent
- collection, use and disclosure of information
- access to information.

4. Why and when your consent is necessary

When you register as a client of Kaleido Health Centre, you provide consent for our GPs and other Kaleido staff to access and use your personal information so they can provide you with the best possible healthcare. Access to your personal information is restricted to Kaleido team members who require it for your care.

By using our website, you consent to the use of tracking pixels as described in this policy. You can manage your tracking preferences through your browser settings or privacy-focused browser extensions.

It is important to us that as our client, you understand why we collect and use your personal information.

Approved	Jul 2025	Reference	K-HIM-01	Version	V1.1	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	-----------	----------	---------	------	-------------------------	---

5. Why do we collect, use, hold and share your personal information?

Kaleido collects, uses, stores, and shares your personal information primarily to manage your health safely and effectively. This includes providing healthcare services, managing medical records, and ensuring accurate billing and payments. Additionally, we may utilise your information for internal quality and safety improvement processes such as audits, accreditation purposes, and staff training to maintain high-quality service standards.

We may also collect additional information about you, such as your sexual orientation, gender identity, ethnicity/cultural background, preferred language. This helps us to better understand and assess our services so we can work to improve. This additional information is always **optional** and you do not need to provide this in order to receive care.

6. What personal information do we collect?

When you engage with us, we may collect and hold some or all of the following personal information:

- **Contact information:** We may collect information such as your name, address, date of birth, contact number and email address;
- **Payment information:** We may collect information from you in order to facilitate payment for services.
- **Medical / Health information:** We may collect health or medical information that is relevant to our services, which may include medical or health records, medical history, medicines, allergies, and adverse reactions immunisations, social history, family history and risk factors
- **Other information:** such as Medicare number (where available) for identification and claiming purposes, as well as healthcare identifiers numbers and/or health fund details.

If you choose **not** to provide the information that is critical to the services you are seeking, we may not be able to provide you with the services, resources and other tools that you may require.

When collecting personal information, Kaleido will take reasonable steps to make an individual aware of:

- What Kaleido is and how to contact us; and
- The purpose(s) of the collection; and
- Consequences (if any) to the individual of non-collection; and
- How to gain access to the information; and
- Why the information is collected; and
- To whom (if anyone) Kaleido may disclose the information; and
- Any law or court/tribunal order that requires the information to be collected; and
- The consequences (if any) to the individual if all or part of the information is not provided; and
- Kaleido's complaint handling process; and
- Any potential overseas disclosure and, if so, the countries to which the disclosure will be made.

Kaleido uses fair and lawful ways to collect personal information and only collects personal information that is necessary for our functions or activities. We collect personal information directly from the individual whenever it is reasonable and practicable to do so.

Approved	Jul 2025	Reference	K-HIM-01	Version	V1.1	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	-----------	----------	---------	------	-------------------------	---

7. Dealing with us anonymously

You have the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorised by law to only deal with identified individuals (in accordance with APP 2).

Dealing with us anonymously may also affect certain processes such as your ability to claim Medicare rebates or use your private health insurance (where applicable).

8. How do we collect your personal information?

Kaleido may collect your personal information in several different ways.

1. When you make your first appointment, Kaleido staff will collect your personal and demographic information via your registration.
2. During the course of providing medical services, we may collect further personal information.
Information may also be collected through electronic transfer of prescriptions (eTP), My Health Record, MyMedicare or other eHealth services you have opted in to.
3. We may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media, or apply for a job or volunteering opportunity with us.
4. In some circumstances personal information may also be collected from other sources. Often this is because it is not practical or reasonable to collect it from you directly. This may include information from:
 - your guardian or responsible person
 - other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services
 - your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).
 - While providing medical services, further personal information may be collected via:
 - electronic prescribing
 - My Health Record
 - online appointments.

We will always comply with privacy obligations when collecting personal information from third-party sources. This includes ensuring transparency with patients, obtaining necessary consents, maintaining data accuracy, securing the information, and using it only for specified purposes.

5. Various types of images may be collected and used, including:
 - **CCTV footage:** Collected from our premises for security and safety purposes. Footage will be used only by Kaleido and by the providers of our security services for security purposes. Surveillance videos are not used by Kaleido for other purposes and the footage is not publicly available. Surveillance cameras are not located in any consult rooms, bathrooms or change room facilities.
 - **Photos and medical images:** These can be taken using personal devices for medical purposes, following the guidelines outlined in the RACGP guide on using personal devices for medical images: [Using personal mobile devices for clinical photos](#)
6. **Use and Purpose of Tracking Technologies:** We use tracking technologies, such as third-party tracking pixels, to collect information about your interactions with our website. These technologies help us analyse website traffic, improve user experience, and deliver targeted advertising. The information collected via tracking pixels is used to understand user behaviour, enhance website functionality, and provide content and advertisements tailored to your interests.

Approved	Jul 2025	Reference	K-HIM-01	Version	V1.1	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	-----------	----------	---------	------	-------------------------	---

9. Storage of Information

The Australian Privacy Principles and the Health Privacy Principles require Kaleido not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

10. When, why and with whom do we share your personal information?

We will sometimes share your personal information:

- with other healthcare providers (e.g. in referral letters)
- when it is required or authorised by law (e.g. court subpoenas)
- when it is necessary to lessen or prevent a serious threat to a client's life, health or safety or public health or safety, or it is impractical to obtain the client's consent
- to assist in locating a missing person
- to establish, exercise or defend an equitable claim
- for the purpose of confidential dispute resolution process
- when it is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- during the course of providing medical services, through eTP, My Health Record, MyMedicare, or other eHealth services you have opted in to.
- with third parties providing services to Kaleido, such as accreditation agencies or information technology providers. These third parties are required to comply with APPs and this policy. Only people who need to access your information will be able to do so.
- with anyone you authorise Kaleido to disclose information to.

Third-Party Tracking:

- We may share information collected via tracking pixels with third-party service providers who assist us in analysing data and delivering personalised content. These providers are obligated to protect your information in accordance with this policy.

Other than in the course of providing medical services or as otherwise described in this policy, Kaleido will not share personal information with any third party without your consent.

11. Sharing information outside of NSW and Australia

We do not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

Approved	Jul 2025	Reference	K-HIM-01	Version	V1.1	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	-----------	----------	---------	------	-------------------------	---

12. Will your information be used for marketing and fundraising purposes?

Kaleido treats marketing and seeking donations for the future growth and development of the Kaleido as important. Personal information held by the Kaleido may be disclosed to an organisation(s) that assist in Kaleido's marketing and fundraising.

Kaleido will not use your personal information for marketing any of our goods or services directly to you without your consent. If you do consent, you may opt-out of direct marketing at any time by notifying Kaleido in writing using the following details:

- Email: admin@kaleidohealth.org.au
- Mailing address: Kaleido Health Centre, 6 Cornwallis St, Eveleigh NSW 2016

13. How is your information used to improve services?

Kaleido may use your personal information to improve the quality of the services offered to clients through research, analysis of patient data for quality improvement and for training activities with the Kaleido team.

We may provide de-identified data to other organisations to improve population health outcomes (e.g. clinical registries). The information is secure, clients cannot be identified and the information is stored within Australia.

You can let our reception staff know if you do not want your information included, or email admin@kaleidohealth.org.au.

14. How are document automation technologies used?

Document automation is where systems use existing data to generate electronic documents relating to medical conditions and healthcare.

Kaleido may use document automation technologies to create documents such as referrals, which are sent to other healthcare providers. These documents contain only your relevant medical information.

These document automation technologies are used through our secure medical software, Best Practice.

All users of the medical software have their own unique user credentials and password and can only access information that is relevant to their role within Kaleido.

Kaleido complies with the Australian privacy legislation and APPs to protect your information.

All data, both electronic and paper, are stored and managed in accordance with the Royal Australian College of General Practitioners (RACGP) [Privacy and managing health information guidance](#).

15. How are Artificial Intelligence (AI) Scribes used?

Practitioners working from Kaleido (e.g. GPs) may use an AI scribe tool to support them to take notes during their consultations with you. AI scribes use an audio recording of your consultation to generate a clinical note for your health record, assisting with medical documentation and to give you a better experience. Your practitioner is responsible for ensuring the accuracy and completeness of the transcription and will check and edit your record at each consult to achieve this.

An example of an AI scribe service which may be used at Kaleido is [Heidi](#), however other products may be used.

Importantly, if it is used by your practitioner, any AI scribe must:

- comply with Australian Privacy Principles;

Approved	Jul 2025	Reference	K-HIM-01	Version	V1.1	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	-----------	----------	---------	------	-------------------------	---

- not share any information outside of Australia, and ensure any data stored is done so on local servers within Australia;
- encrypt all information captured, and destroy original audio files from its servers immediately once the transcription is complete.
- remove sensitive, personal identifying information as part of the transcription.

Kaleido practitioners will only ever use data from an AI digital scribe service to provide health care services to you.

16. Research

The National Health and Medical Research Council (NHMRC) has issued guidelines (s95 and s95a) relating to the use of information for research purposes. These guidelines balance the protection of an individual's health information with the need for ethically approved research using individuals' health data without consent.

All research projects are required to have appropriate Human Research Ethics Committee (HREC) approval in place prior to any information being provided, or before any client can be approached to participate in research. The HREC approval will outline the consent requirements for the study (e.g. individual express consent, opt-out consent or a waiver of consent) in accordance with the NHMRC guidelines and privacy requirements.

17. How is your personal information stored and protected?

Your personal information may be stored at Kaleido in various forms. This may include paper records, electronic records – including within our Practice Management software, Best Practice – as well as visual records (X-rays, CT scans, videos and photos), and audio recordings.

Kaleido also uses CCTV at our premises, outside the building and within main/waiting areas, but excluding consulting and treatments rooms.

Kaleido stores all digital personal information securely in protected information systems and takes various precautions to prevent misuse, loss, unauthorized access, modification, interference or disclosure by use of various methods including firewalls and passworded access rights to computerised records.

Any paper records or information which contain personal or sensitive information are stored in locked cabinets or offices and will only be accessible to people with a need to access that information.

18. How can you access and correct your personal information?

Kaleido endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. You have the right to request access to, and the correction of, your personal information.

Kaleido will do this either over the phone or face-to-face. An individual may arrange an appointment to view their personal information or they may request a written copy.

Kaleido acknowledges clients may request access to their medical records. We require you to put this request in writing to admin@kaleidohealth.org.au and Kaleido will respond within a reasonable time (approximately 30 days). You may be required to complete an additional consent form to access a transcript of your medical records.

Kaleido will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information. If a fee is applicable, Kaleido will advise you of this prior to completing your request so you are aware of any costs involved. Fees will be set in accordance with the [State Insurance Regulatory Authority](#) (SIRA) or Australian Medical Association (AMA) guidelines.

Kaleido will take reasonable steps to correct your personal information where the information is not accurate or up to date. Sometimes, we will ask you to verify your personal information held by Kaleido is correct and current. You may also request that we correct or update your information. To do this, please make a request in writing to admin@kaleidohealth.org.au.

Approved	Jul 2025	Reference	K-HIM-01	Version	V1.1	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	-----------	----------	---------	------	-------------------------	---

Under special circumstances outlined in APP 12, Kaleido may refuse to allow a client to see information held about them, but is required under the Act to explain why. If a client thinks their information is not being used or held appropriately (in accordance with the Act), they may make a complaint to Kaleido or the Privacy Commissioner.

19. How can you lodge a privacy-related complaint, and how will the complaint be handled at Kaleido?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing using the details provided below:

- Email address: manager@kaleidohealth.org.au
- Mailing address: Kaleido Health Centre, 6 Cornwallis St, Eveleigh NSW 2016
- Contact number: 02 8323 7378

We will then attempt to resolve it within 30 days, in accordance with our resolution procedure.

If you do not feel we have resolved your issue, you may also contact the Office of the Australian Information Commissioner (OAIC). Generally, the OAIC will require you to give them time to respond before they will investigate. For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992.

Alternatively, you may contact the NSW Health Care Complaints Commission (HCCC) via telephone: (02) 9219 7444 / 1800 043 159 (Toll Free in NSW) or via their website: www.hccc.nsw.gov.au

20. Privacy and our website

Kaleido may collect personal information via our website and social media channels when you engage with us. Any personal information you share with us through website, email, and social media, is handled securely and confidentially.

We use analytics and cookies. More information on this is provided below:

- Cookies and clickstream

When you visit, access, or use our website, mobile site, application, electronic newsletter and/or widgets (collectively “Site”), Kaleido (“us,” or “we”) may use cookies and other tracking technologies to deliver and improve the Site, and to display relevant content, products, services and advertising.

This policy explains these technologies, including cookies, local storage, pixels, web beacons, and flash cookies, and how you can control them. In this policy, we will refer to all these technologies as “Cookies”.

We hope that this helps you understand, and feel more confident about our use of Cookies. By using the Site, you agree that we can use these Cookies as described in this policy,

- What is a Cookie?

Cookies and other tracking technologies (such as browser cookies and local storage, pixel beacons, and Adobe Flash technology including cookies) are comprised of small bits of data or code that often include a de-identified or anonymous unique identifier. Websites, apps and other services send this data to your browser (on your computer or mobile device) when you first request a web page and then store the data on your computer so that such websites, apps and other services can access information when you make subsequent requests for pages from that service. They are widely used in order to make websites work, or work in a better, more efficient way. For example, they can recognise you and remember important information that will make your use of a website more convenient (e.g., by remembering your user preferences).

- What Cookies do we use?

Approved	Jul 2025	Reference	K-HIM-01	Version	V1.1	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	-----------	----------	---------	------	-------------------------	---

We use a variety of different types of Cookies on our Sites. Different Cookies have different specific purposes but in general they are all used so that we can improve your experience in using our Sites and interacting with us. Some of the purposes of different Cookies we use are described below.

- (A) Some Cookies are essential to the Site in order to facilitate our log-in process and enable you to move around it and to use its features. Without these Cookies, we may not be able to provide certain services or features, and the Site will not perform as smoothly for you as we would like.
- (B) We may use Cookies to allow us to remember the choices you make while browsing the Site, and to provide enhanced and more personalised content and features, such as customising a certain webpage, providing relevant advertising or editorial content, remembering if we have asked you to participate in a promotion and for other services you request, like watching a video or commenting on a blog.
- (C) We may use Cookies to receive and record information about your computer, device, and browser, potentially including your IP address, browser type, and other software or hardware information. If you access the Site from a mobile or other device, we may collect a unique device identifier assigned to that device (“UDID”), geolocation data, or other transactional information for that device.
- (D) We may use analytics Cookies, which are sometimes called performance cookies, to collect information about your use of the Site and enable us to improve the way it works. Analytics Cookies collect information about how you use the Site, for instance, which pages you go to most. The information allows us to see the overall patterns of usage on the Site, help us record any difficulties you have with the Site and show us whether our advertising is effective or not.

- **How can you opt out of cookie settings?**

Most browsers are initially set to accept cookies, but you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information. Please note that by blocking any or all cookies you may not have access to certain features, content or personalisation available through the website.

For more information about targeting and advertising cookies, please visit [Your Online Choices](#).

We may update our use of tracking technologies from time to time. Any significant changes will be reflected in this policy.

21. Policy review statement

This policy is reviewed regularly, at least every 3 years, to ensure it remains applicable to current practice procedure and compliant with legal requirements.

If any changes are made:

- They will be reflected on the website.
- Significant changes may be communicated directly to clients via email or other means.

Please check the policy periodically for updates. If you have any questions, feel free to contact us.

This policy statement was developed in line with guidance from [Australian Government Office of the Australian Information Commissioner \(OAIC\)](#) and the [Royal Australian College of General Practitioners \(RACGP\)](#).

Approved	Jul 2025	Reference	K-HIM-01	Version	V1.1	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	-----------	----------	---------	------	-------------------------	---