

Nicholl Holdings Pty Ltd Privacy Policy

Current as of: 28th May 2026

Introduction

This privacy policy is to provide information to you, our patient, on how your personal information (which includes your health information) is collected and used within our practice, and the circumstances in which we may share it with third parties.

Why and when your consent is necessary

When you register as a patient of our practice, you provide consent for our GPs and practice staff to access and use your personal information so they can provide you with the best possible healthcare. Access to your personal and health information is restricted to practice team members who require it for your care. If we need to use your information for anything else, we will seek additional consent from you to do this.

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

Our practice will collect, use, store and share your personal information to manage your healthcare safely and effectively. Our main purpose for collecting, using, holding and sharing your personal information is to provide health care services and manage your health, medical records, and ensure accurate billing. Additionally, we may use it for internal quality and safety improvement processes such as practice audits, accreditation purposes, and business processes, and staff training to maintain high-quality service standards.

What personal information do we collect?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- healthcare identifiers
- health fund details.

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 authorized by law to only deal with identified individuals. Acting anonymously can have consequences with regards to ongoing healthcare, or claim billing, so due consideration will be given to individual requests for pseudonymity.

How do we collect your personal information?

Our practice may collect your personal information in several different ways.

1. When you make your first appointment our practice 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 via electronic transfer of prescriptions (eTP), My Health Record via Shared Health Summary or Event Summary).
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.

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).

Various types of images may be collected and used, including:

- **CCTV footage:** Collected from our premises for security and safety purpose
- **Photos and medical images:** These can be taken using devices for medical purposes, following the guidelines outlined in our guide on using personal devices for medical images.

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.

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

We sometimes share your personal information:

- with third parties who work with our practice for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with APPs and this policy
- with other healthcare providers
- 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 patient's life, health or safety or public health or safety, or it is impractical to obtain the patient'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 there is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- during the course of providing medical services, through electronic prescribing, My Health Record (e.g. via Shared Health Summary, Event Summary).

Only people who need to access your information will be able to do so. Other than in the course of providing medical services or as otherwise described in this policy, our practice will not share personal information with any third party without your consent.

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

Our practice will not use your personal information for marketing any of our goods or services directly to you without your express consent. If you do consent, you may opt out of direct marketing at any time by notifying our practice in writing.

Our practice may use your personal information to improve the quality of the services we offer to our patients through research, analysis of our patient data for quality improvement and for training activities with the practice team.

We may provide de-identified data to other organisations to improve population health outcomes. The information is secure, patients 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.

How are document automation technologies used?

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

The practice uses 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 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 in the practice team.

The practice 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 Privacy and managing health information guidance.

How are Artificial Intelligence (AI) scribes used?

The practice uses an AI scribe tool to support GPs take notes during their consultations with you. The AI scribe generates a clinical note for your health record.

These AI Scribes:

- does not share information outside of Australia
- destroys the audio file once the transcription is complete.
- removes sensitive, personal identifying information as part of the transcription

The practice will only use data from our digital scribe service to provide healthcare to you.

Short Message Service (SMS) & Email Communication

Messages are generated directly through our medical records software – Best Practice Software (BPS) or by a secure third-party service provider. These services are free to use for patients. They do not or will not sell patient information to third parties.

Patients under the age of 16 years may not use the electronic messaging system without their parent or guardian's consent.

The Practice will never transmit any information that would enable an individual patient to be identified or disclose any specific health information pertaining to the patient i.e., the names of tests or results. On receipt of SMS, there is a requirement to verify yourself with an identity check, in line with RACGP and Australian privacy laws, prior to having access to the health message. On receipt of an email, there may be a PIN verification sent to you to enable you to open the documents sent.

In addition to other communications, we may send you from time to time, we may send you the following types of communications:

1. **Appointment reminders** – notifications to you to remind you of upcoming appointment dates with the practice as well as allowing you to confirm your appointment;
2. **Clinical reminders** - notifications to you to remind you to contact the practice to arrange appointments for regular clinical check-ups, medical procedures, immunisations due;
3. **Clinical communications** - communications to you about your clinical care at the practice such as results, certificates or clinical messages from the medical practitioner (e.g. referral letters, care plans, diagnostic requests); and
4. **Health awareness** – communications to you in relation to general health care information and health care services provided by this general practice including notification about changes to our clinic opening hours, and information about health care services provided by this general practice.
5. **Billing purposes** – compliance with Medicare / DVA assignment forms or invoices

To the extent practicable, the practice will send you communications via the preferred contact method you have indicated. However, we may contact you using any of your contact details that you may provide to us from time to time as we consider appropriate.

Patients are also responsible for keeping the practice informed of their up-to-date electronic contact information at all times, or if the details are no longer in the patient's possession. Due to clinical information being sent, the practice recommends that a personal and individual email address and mobile number be provided (i.e., not a work email, or shared spouse phone number etc)

To the extent that the mobile number and email address provided to this general practice is utilised by more than one patient, all communications will be directed to that number or email.

I understand that this consent is valid and binding unless and until it is revoked in writing. I agree that the practice may rely on this consent without any need to further verify the veracity of this consent. I understand I may revoke or suspend this consent in writing at my absolute discretion for any reason that I see fit.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms (e.g. as electronic records, and radiology imaging and pathology results).

Our practice stores all personal information securely in electronic format, in protected information systems in a secure environment. Access to medical records is password protected and permission level appropriate. All doctors, staff and contractors sign confidentiality agreements.

All CCTV footage is stored electronically for a period of 14 days.

How can you access and correct your personal information at our practice?

You have the right to request access to, and correction of, your personal information.

Our practice acknowledges patients may request access to their medical records. We require you to put this request in writing and our practice will respond within a reasonable time. Fees may apply.

Our practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. From time to time, we will ask you to verify that your personal information held by our practice is correct and current. You may also request that we correct or update your information.

How can you lodge a privacy-related complaint, and how will the complaint be handled at our practice?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing. We will then attempt to resolve it in accordance with our resolution procedure. Please see the contact information below for our clinics:

Cairns GP Superclinic

Address: PO Box 5294, Cairns, Qld, 4870

Phone: 07 4052 1119

Email: admin@cairnsgpsuperclinic.com.au

Townsville GP Superclinic

Address: PO Box 3060, Hermit Park, Qld, 4812

Phone: 07 4753 0888

Email: admin@townsvillesuperclinic.com.au

The Doctors Mulgrave Road

Address: PO Box 5060, Cairns, Qld, 4870

Phone: 07 4044 0444

Email: admin@mulgraveroad.com.au

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 investigate. For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992.

Privacy and our website

Any personal information you share with us through website, email and social media is handled securely and confidentially. This practice uses analytics and cookies.

When you interact with our website, such as by contacting us, you may provide us with personal information, including but not limited to:

- Name
- Email address
- Phone number
- Any other information you choose to provide

Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. Any changes to this policy to comply with current obligations:

- will be immediately updated on our website for your reference.
- Significant changes may be communicated directly to patients via email or other means.

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