

# Dens in Dente Dental Care Privacy Policy

Welcome to Dens in Dente Dental Care!

We value your privacy and we work hard to protect the information you provide to us.

Dens in Dente Pty Limited ACN:149 760 789 (**we, us, our**) is a dental surgery located at Shop 2, 138-142 Botany Road, Alexandria NSW 2015 (**the Clinic**) that provides high quality comprehensive dental care for all age groups in a multi-culturally diverse community. We have a particular interest in special care dentistry for children and the elderly with special needs or with complex medical conditions, routine preventative dentistry to restore the health of your gums and teeth and a wide range of cosmetic treatments to restore your oral function and to enhance the natural beauty of your smile.

Dens in Dente Dental Care is bound by the Australia Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Health Privacy Principles in the *Health Records and Information Privacy Act 2002* (NSW).

This Privacy Policy explains how we manage your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable), including our obligations and your rights in respect of our dealings with your personal information.

Please take a moment to read this Privacy Policy as it describes what happens to your personal information that is collected when you attend the Clinic, when you use or make a booking through our website at [www.densindente.com.au](http://www.densindente.com.au) (the **Website**) or when you interact with us on social media.

## 1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you.

We may collect the personal information you directly give us through some of the following means:

- a) when you make an inquiry or booking through our website located at [www.densindente.com.au](http://www.densindente.com.au);

- b) when you attend the Clinic:
  - (i) Your treating health care provider (dentist, dental therapist, oral health therapist and/or dental hygienist) will make health records, which will be held and managed by us. All health information held by Dens in Dente Dental Care will be managed in accordance with the *Health Records and Information Privacy Act 2002* NSW;
  - (ii) We operate a CCTV system to monitor the security of our premises;
- c) when you contact us via telephone or facsimile;
- d) when you contact us via social media, including but are not limited to our Facebook, LinkedIn, Twitter, Instagram, Pinterest or Yelp accounts;
- e) from correspondence (whether in writing or electronically), including when you complete a form on our Website or write to us by email or by mail;
- f) when administering any of our services; and
- g) as otherwise required to manage our business.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

## **2. Types of personal information we collect**

The type of personal information we may collect can include, but is not limited to:

- a) full name including nickname,
- b) gender,
- c) residential address,
- d) email address,
- e) phone numbers,
- f) date of birth,
- g) extra-oral and intra-oral photos of your mouth,
- h) study models of your teeth,
- i) CCTV images,

- j) radiographs;
- k) billing and shipping information,
- l) your device ID and IP address,
- m) statistics on page views and traffic,
- n) standard web log-in information, and;
- o) if applicable, details of the enduring guardian or person responsible.

We will also collect and hold sensitive health information about you, including your dental and medical history, past dental treatments, treatment plans, medical images and any other health information you provide to our staff. We only collect sensitive health information about you with your consent, or otherwise in accordance with the Privacy Act.

Where you do not wish to provide us with your personal information, we may not be able to provide you with the requested services.

### **3. Our purposes for handling your personal information**

We collect, hold, use and disclose personal information to:

- a) offer and provide you with dental services and/or products,
- b) manage and administer those services and products, including account keeping procedures,
- c) manage and securely protect our facilities,
- d) communicate with you about, including (but not limited to), the services you have sought, provide you with information about treatment provided to you and send you follow-up reminders,
- e) comply with our legal and regulatory obligations,
- f) consider your application for employment (if applicable), and;
- g) otherwise to manage our business.

### **4. Disclosure of personal information**

We may disclose personal information to third parties such as:

- a) dental specialists,
- b) dental prosthetists,
- c) dental technicians,
- d) organisations that provide us with technical and support services, and/or;
- e) our professional advisors, where permitted by the Privacy Act.

If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

Specifically, we may disclose personal information to:

- f) Cloud service providers for the purposes outlined in this Privacy Policy; and
- g) If required by law, the Police and other law enforcement officials.

We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

## **5. Protection of personal information**

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, as records on third party servers, which may be located overseas.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

## **6. Direct marketing**

Like most businesses, marketing is important to our continued success. We believe we have a unique professional service that we provide to customers at a high standard. We therefore like to stay in touch with patients and let them know about new treatments that may be appropriate for them. We may provide you with information about new treatments and services that may be of interest to you.

We will not disclose your personal information to third parties for marketing purposes without your consent.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by following unsubscribe links included in each marketing email or by contacting our clinic.

## **7. 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 are experiencing 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 permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

## **8. Accessing and correcting your personal information**

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. We will require you to complete a form if you want personal information released to you.

On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

## **9. Overseas transfers of personal information**

As at the date of this Privacy Policy, we will not disclose your personal information to overseas recipients.

If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

If you do not want us to disclose your information to overseas recipients, please let us know.

From time to time we may engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider. However, by providing us with your personal information, you consent to the storage of such information on overseas servers (including servers located in the United States of America). For the avoidance of doubt, in the event that an overseas recipient breaches the APPs, that entity will not be bound by, and you will not be able seek redress under, the Privacy Act.

## **10. Mandatory Data Breach Notifications**

Pursuant to the Privacy Act, we are required to notify you and the Office of the Australian Information Commissioner in circumstances where:

- a) we suspect that a data breach relating to your personal information has occurred,
- b) there is real risk of serious harm to you as a result of the breach; and
- c) we cannot take remedial steps to reduce the risk of serious harm.

## 11. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

### **The Privacy Officer**

Dr. Thien-Nhien Nguyen

Telephone: +61 2 8399 3661

Email: [tn\\_nguyen@densindente.com.au](mailto:tn_nguyen@densindente.com.au)

We take all complaints seriously and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

### **Office of the Australian Information Commissioner**

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## 12. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website and we encourage you to check our website periodically to make sure you are aware of our current Privacy Policy.

The last update to this document was July 2019.