

Maxwell Minds Privacy Policy

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At Maxwell Minds, we are committed to maintaining the highest standards of privacy in alignment with our ethics, values and in compliance with Australian laws and regulations.

Occasionally we need to share your personal information to involve others in your healthcare, or for other reasons, and this policy outlines when, how, and why we share your information.

The objective of this document is to provide you, our patient, with clear information on how your personal information is collected and used within the practice.

We work hard to ensure that your personal information remains protected and handled with the utmost care and integrity. Please contact us if you have any further questions.

Who can I contact about this policy?

For enquiries concerning this policy, you can contact Penelope Maxwell, contact@maxwellminds.com.au or phone 02 4091 7496

When and why is your consent necessary?

When you register as a patient of this practice, you provide consent for the AHPRA registered clinicians (e.g. Penelope Maxwell is an AHPRA registered pharmacist) and practice staff to access and use your personal information to facilitate the delivery of healthcare. Access to your personal information is restricted to practice team members who require it for your care. If we ever seek to use your personal information for purposes other than outlined in this document, we will first obtain additional consent from you.

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

By acknowledging this Privacy Policy you consent to us collecting, holding, using, retaining and disclosing your personal information in the manners described below.

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

Maxwell Minds 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 practice audits, accreditation purposes, and staff training to maintain high-quality service standards.

What personal information is collected?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medicines, allergies, and adverse reactions immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes

- healthcare identifier numbers

Can you deal with us anonymously?

You can 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 deal with identified individuals.

How is personal information collected?

The practice may collect your personal information in several different ways:

When you make your first appointment, the practice team will collect your personal and demographic information via your registration.

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.

In some circumstances, personal information may also be collected from other sources, including:

- Your guardian or responsible person.
- Other involved healthcare providers, such as specialists, GPs, allied health professionals, hospitals, community health services, pharmacies, pathology and diagnostic imaging services.
- Your health fund, Medicare, or the Department of Veterans' Affairs (if relevant).
- Other data bases such as SafeScript
- While providing medical services, further personal information may be collected via:
 - Medicare
 - My Health Record
 - SafeScript
 - Online appointments

We only collect such information to the extent that it is necessary for us to provide our services to you.

Our objective is to collect personal information directly from you unless it is unreasonable or impractical to do so.

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

CCTV footage: Collected from some premises that Maxwell Minds operates from for security and safety purpose.

Photos and 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 other healthcare providers (e.g. In referral letters, or developing a medication management plan)
- when it is required or authorised by law (e.g. court subpoenas, or where unlawful activity is suspected)
- 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 advise a relative of relevant genetic information where this is necessary to prevent a serious threat to the life, health or safety of that relative
- 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)
- With third parties for business purposes, 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 personal information will be able to do so. Other than providing medical services or as otherwise described in this policy, the practice will not share personal information with any third party without your consent.

On occasion, we may engage virtual assistants located outside of New South Wales or Australia to assist with administrative tasks, and report preparation. In such circumstances, your personal information will not be directly protected by New South Wales or Australian legislation (as the case may), but we take such steps as are reasonable to ensure that the overseas recipient handles your personal information in accordance with the New south Wales Health Privacy Principles or Australian Privacy Principles (as applicable).

To ensure the security and privacy of all sensitive information, the following measures will be strictly adhered to in any instance that this occurred:

- **Data encryption:** all data is sent, and stored under strict encryption and data security processes
- **Training and Compliance:** Any overseas based assistants will only be engaged when they are working for a company that can ensure adherence to Maxwell Minds strict data and privacy policy adherence. Any overseas assistants or associated would undergo comprehensive training in Maxwell Minds' security and privacy policies to ensure they meet our stringent standards.
- **Secure Access:** Assistants are only permitted to access and work from secure databases that comply with Australian data protection requirements.
- **Internet:** only private password protected internet may be used.
- **Confidentiality Agreements:** All overseas assistants are required to sign legally binding privacy and confidentiality non-disclosure agreements that align with Australian legal standards.
- **Restricted Access:** Assistants will not have access to or interact with sensitive systems such as MyHealthRecord, Medicare records, or SafeScript.

By implementing these safeguards, we ensure that your personal information remains protected and handled with the utmost care and integrity.

Will your information be used for marketing purposes?

The practice will not use your personal information for marketing any goods or services directly to you without consent. This is part of our patient registration documents. In the event you consent to direct marketing, you may opt out at any time via the clear option in any marketing, or notifying Maxwell Minds via email: admin@maxwellminds.com.au

How is your information used to improve services?

The practice may use your personal information to improve the quality of the services offered to

patients through research, analysis of patient data for quality improvement and for training activities with the practice team. We will de-identify your data wherever possible. Note we have strict policies on confidentiality and privacy for staff.

We may provide de-identified data to other organisations to improve population health outcomes. If we provide this information to other organisations, patients **cannot** be identified from the information we share, the information is secure and is stored within Australia. You can let reception staff know if you do not want your de-identified information included.

At times, health care practices are approached by research teams to recruit eligible patients into specific studies which require access to identifiable information. You may be approached by a member of our practice team to participate in research. Researchers will not approach you directly without your express consent having been provided to the practice. If you provide consent, you would then receive specific information on the research project and how your personal health information will be used, at which point you can decide to participate or not participate in the research project. If you do not provide consent, you will not be contacted by researchers.

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

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 Australian regulations.

How are Artificial Intelligence (AI) Scribes used?

The practice uses an AI scribe tool to support your clinician take notes during their consultations with you. The AI scribe uses an audio recording of your consultation to generate a clinical note for your health record. The practice AI scribe service is Bizzy AI (via Zanda).

Bizzy AI:

- Sends the secure and encrypted audio file outside Australia to be transcript share information outside of Australia.
- Destroys the audio file once the transcription is complete.
- Retains sensitive, personal identifying information in the transcription.
- Sends the transcription back to Australia (via secure encrypted process) and stores it on Australian Servers only.

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

How is your personal information stored and protected?

Your personal information may be stored in various formats, including paper records, electronic records, and occasionally visual records.

We do not retain information for longer than is necessary unless there is a statutory obligation for us to do so.

Maxwell Minds stores all personal information securely. All records are either kept within digitally protected information systems or in secured physical environments.

This includes:

- **Digital Storage:**

- We use **Zanda**, a patient management system certified to the internationally recognised information security standard **ISO/IEC 27001:2013**, which provides strong controls against unauthorised access and data loss.
 - ISO 27001 establishes a comprehensive framework covering access control, encryption, physical and environmental security, staff training, incident management, and system monitoring. Many of these controls directly support compliance with the Privacy Act 1988 and the Australian Privacy Principles (APPs).
 - The standard requires ongoing monitoring and improvement, aligning with APPs' requirement to regularly evaluate and enhance privacy practices.
 - ISO 27001 also demands thorough documentation and accountability, ensuring we can demonstrate compliance with privacy obligations through policies, procedures, and audits.
 - A key element is prompt incident response and breach management, supporting compliance with Australia's Notifiable Data Breaches (NDB) scheme, which requires timely reporting of data breaches.
- Some personal and sensitive information is occasionally stored in the **Microsoft Office 365 cloud**, where data is encrypted and regularly backed up to protect against data loss and unauthorised access.
- We implement **two-factor authentication** at Maxwell Minds to strengthen access security.
- Sensitive information is encrypted both in the cloud and when sent by email to maintain confidentiality.
- Our robust privacy policy and sensitive information management systems are designed to protect your data.
- We engage **Peritus Digital** as our IT specialist partner, who conducts regular security audits and oversees ongoing digital security management.
- Your information is stored securely on both Zanda and Maxwell Minds' Office 365 systems.

- **Physical Storage:**

- Access to rooms where physical records are kept is strictly locked and controlled.
- Whenever possible, personal information is digitised and stored securely as outlined above. Where physical copies are necessary, these are kept in locked cabinets accessible only by Maxwell Minds staff.

- **Staff and Confidentiality:**

- All Maxwell Minds staff, contractors, volunteers, and associates who handle personal information are bound by strict confidentiality agreements.
- Staff members receive ongoing training in Maxwell Minds' privacy policies and procedures to ensure compliance with privacy obligations.

- **CCTV Footage:**

CCTV footage at clinic and office locations, including external areas, is maintained by the management of those premises in accordance with their policies. Maxwell Minds does not manage or control this footage. Your personal information may be stored in various forms. This includes paper records, electronic records and visual records on occasion.

The practice stores all personal information securely. All records are kept in digital protected information systems, or in a secured environment.

How is privacy on the website maintained?

When the website is live, any personal or sensitive information entered by users is submitted directly to our Patient Management System, Zanda, via a secure link—not stored on the website itself. Therefore, no personal information is retained on the website.

For details on how Zanda protects your data, please refer to the digital security section above.

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

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

The practice acknowledges patients may request access to their medical records. Please submit request Maxwell Minds administration (contact@maxwellminds.com.au). The practice will respond to any requests to access or correct your personal information within 10 business days (not including public holidays or times of office closures). Provision of medical records may attract a fee to cover costs of preparation and administrative costs (if complex or time consuming). In some circumstances we are permitted to decline access, in which case we will provide you with written reasons.

The practice 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 the practice is correct and current. You may request we correct or update your information. To do this please contact via contact@maxwellminds.com.au.

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

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have. We will then attempt to resolve it in accordance with the resolution procedure.

Contact Penelope Maxwell (owner and privacy officer) via one of the following three methods:

Email: contact@maxwellminds.com.au)

Mail: Maxwell Minds level 3 I2N Honeysuckle Hub, 16B Honeysuckle Drive, Newcastle, NSW 2300.

Phone: 02 4091 7496



You will receive a response in 10 business days (excepting public holidays or times of office closure e.g. between Christmas and New Years)

If you do not feel we have resolved your issue You may also contact the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner will require you to give them time to respond before they investigate. For further information visit www.oaic.gov.au or call the OAIC (Office of the Australian Information Commissioner) on 1300 363 992. Note also that where your complaint involves an alleged breach of a Health Privacy Principle under the *Health Records and Information Privacy Act 2002* (NSW), you may also be able to lodge a complaint with the New South Wales Privacy Commissioner.

Policy review statement

Our privacy policy is regularly reviewed to ensure compliance with current obligations. If any changes are made:

- They will be reflected on the website.
- 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.