

Privacy Policy

Version 1.0 – February 2025

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Document Control

Name	Privacy Policy		
Person Responsible	Privacy Lead		
Authorised by	Chief Executive Officer		
Adopted by	I-MED Board of Directors		
Review Period	Annual		
Next Review Date	February 2026		
Document version	Description	Date authorised	Date adopted
1.0	Privacy policy	11 December 2024	3 February 2025

This document was current at the time of issue (February 2025). Readers should refer to the electronic version posted to InforNet for future updates.



1. Introduction

1.1. Overview

Your privacy is important to us, and we are committed to protecting the privacy of those who interact with us (you). This Privacy Policy sets out why and how I-MED Radiology Network Limited (ABN 21 093 625 346) and its associated companies (I-MED, us, we or our) collect, use, store and share the personal information of:

- our patients;
- prospective and former employees, trainees and workplace placements (Former Staff and Candidates); and
- health professionals who refer patients to us, interact with us or use our services (Referrers).

We set out below how we comply with Australian law (including the Privacy Act 1988 (Cth)) when managing your personal and sensitive information).

It is important that you read and understand this Privacy Policy. It contains sections that are applicable to patients of I-MED as well as other individuals. If you are a patient, Sections A and C of this Privacy Policy will be relevant to you. If you are not a patient of I-MED, Sections B and C of this Privacy Policy will be relevant to health professionals, Referrers, Former Staff and Candidates.

1.2. Who do we collect information about ?

This policy describes how we collect and handle personal and sensitive information about our (i) patients, (ii) health professionals and Referrers, and (iii) Former Staff and Candidates.

We won't be able to provide you with a clinical service if you choose to deal with us anonymously or pseudonymously (by using another name or nickname), however you may choose to do so for any other purpose.

In circumstances where you choose to have your information anonymised after you receive medical imaging or nuclear medicine services (our services), we can facilitate that process, however this would mean that we (and Referrers) are not able to associate your anonymised images and reports to your medical record.

2. Section A: Information for Patients

This Section A applies to patients.

2.1. What kind of person information do we collect and hold about you ?

We collect, use and disclose your personal and sensitive information so that we can provide you with our services.

The types of information we collect and hold about you are:

- your name, contact details, sex, gender, date of birth;
- medical images of you, your clinical history (such as medication taken, previous test results), correspondence to and from healthcare providers, records of our past engagement with you and other relevant circumstances, such as your family, medical or employment history; and



- relevant government and insurance identifiers (such as your Medicare number or private health insurance details), when necessary for billing or other administrative purposes.

2.2. How do we collect and hold personal information ?

We collect, use and disclose your personal and sensitive information so that we can provide you with our services.

- you, when you attend our clinics, book an appointment, contact us by phone, email or through our websites;
- your request or referral form from your Referrer which includes information about your past clinical history;
- people or entities that ask us to provide you with our services, for example a hospital where you are a patient, a government department, an allied health professional, your employer, or a trial company where you are a participant in a clinical trial;
- associated I-MED entities;
- the results of any tests or procedures from other medical service providers, such as pathology and other diagnostic testing providers; or
- someone who is responsible for you, for example your guardian, carer or translator.

When we collect your personal and sensitive information from someone else, we do so on the basis that they have your consent to provide the information to us or are otherwise required or authorised by law to provide it to us.

In the course of providing you with our services, including when we use digital radiology technology and programs, we may generate personal and sensitive information that relates to you (e.g. scans and diagnostic reports).

2.3. Why do we need your personal information ?

The main reason we collect, hold, use and disclose your personal and sensitive information is to provide our services to you and to carry out patient-related services.

2.4. How do we use personal information ?

We use your personal and sensitive information to:

- provide our services to you, including to provide a medical diagnosis or opinion and assess your health status;
- obtain or provide copies of past medical images of you, reports or other clinical information to your Referrer and their staff, other healthcare providers and their staff, and other relevant service providers and their staff (e.g. insurers);
- respond to your enquiries, provide you with a copy of your records and verify your identity;
- upload information to your MyHealth Record in accordance with your account permissions;
- carry out administrative and internal business services (e.g. billing, payment matching, complaint handling, risk management and practice accreditation);
- carry out statistical analysis, quality assurance and internal investigations;
- send out reminders for appointments;
- provide information to your employer or a government department, if the services were requested by them for you;
- notify relevant organisations (e.g. medical insurers and/or legal advisors) of an incident;
- comply with laws and assist government or law enforcement agencies where we are required or authorised to do so;



- manage our information and systems security and risks such as supporting the management of our information security and network procedures to prevent cyber-attacks, unauthorised access and other criminal or malicious activities;
- facilitate clinical or medical research where permitted by law;
- improve the use and operation of technology tools (including artificial intelligence (AI)) in the delivery of healthcare services;
- design and improve our services through system training and technical enhancements (including AI) in order to improve patient and Referrer services, health outcomes and other business activities;
- prepare case reports for discussion at clinical meetings and clinician education.

We may also use your personal and sensitive information by de-identifying it, in order for I-MED to:

- undertake certain de-identified data projects that are described at [Your Privacy | I-MED Radiology Network](#) from time to time (**Data Projects**); and
- prepare online medical education, external clinical case conferences and seminars, and for preparation of medical publications.

We use technology tools (including AI) in the delivery of our services to you. These tools use your personal and sensitive information to: support the booking of your service; generate medical images of you; support clinical decision making; and to dictate your radiology report via speech recognition, which also continuously trains the tool, to improve the accuracy of your reports and other patients' reports.

Information will be considered to be de-identified where it has undergone a process of de-identification such that it no longer falls within the definition of personal information under the *Privacy Act*.

2.5. How do we use personal information ?

We share your personal and sensitive information outside of I-MED for medical, insurance, legal, management, business improvement and administrative reasons, including with:

- healthcare providers and their administrative staff (for patient-related services), including those that:
 - are or become involved in your healthcare;
 - tell us of a serious threat to your health or safety, or other medical reason which are for your benefit;
 - have access to I-MED's health records portal, which includes your health information (**Patient Results Portal**). Health professionals are granted access to our Patient Results Portal if they register an account with us and are subject to our terms of access and use of the Patient Results Portal, which includes confidentiality and privacy obligations;
- your authorised representatives;
- insurers (including Medicare) for the purpose of benefits payable or other third parties for billing/accounts purposes;
- our staff and members of our group, and our professional advisors (e.g. auditors and legal advisors) and medical insurers;
- our third party suppliers and contractors that help us deliver our services and business operations;
- government and regulatory authorities, law enforcement and other organisations, where required or authorised by or under Australian law;
- clinics, research bodies or other healthcare providers for the purpose of engaging in clinical or medical research where permitted by law; and



- our authorised technology partners for the purpose of de-identifying personal and sensitive information to enable I-MED to then use that de-identified information for Data Projects (**Authorised Technology Partners**).

Except as outlined above, we don't share your sensitive information with unrelated third parties without your consent or unless we are authorised or required to do so by law.

3. Section B: Information for Health Professionals, Referrers, Former Staff and Candidates

B1: Health professionals and Referrers

This Section B1 applies to health professionals and Referrers (excluding patients)

3.1. What kind of information do we collect and hold about you ?

The personal information we collect and hold about you may include identity and other general personal information, such as your name, contact details, sex, gender, date of birth, role or profession and place of employment.

3.2. How do we collect and hold personal information ?

We collect personal information about you from:

- you (e.g. when you contact us by phone, email or our websites/ portals, or submit a referral form);
- associated I-MED entities; and
- third party service providers (including IT service providers).

When we collect your personal information from someone else, we do so on the basis that they have your consent to provide the information to us or are otherwise required or authorised by law to provide it to us.

3.3. Why do we need your personal information ?

The main reason we collect, hold, use and disclose your personal information is to facilitate our usual business operations, including the provision of medical imaging and nuclear medicine services to our patients.

For you as a medical practitioner, we also collect, hold, use and disclose your personal information to design, improve and manage our services, business and your experience with us. We use technology tools (including AI) to enable us to do this.

3.4. Use of personal information ?

We use your personal information to:

- provide medical imaging and related health services to our patients (e.g. where you are the Referrer);
- provide you with a user account to certain of our systems (e.g. to view your patient's medical imaging results);
- carry out administrative services (e.g. payroll, billing, licensing verification, practice accreditation and statistical analysis);
- improve the services we provide (including by facilitating education and training to improve the delivery of medical services to patients, and via the implementation of technical enhancements to our systems and protocols);
- comply with laws and assist government or law enforcement agencies where we are required or authorised to do so;



- manage our security and risks such as supporting the management of our information security and network procedures to prevent cyber-attacks, unauthorised access and other criminal or malicious activities; and
- engage in Data Projects.

We may also use your personal information to provide you (e.g. by email) with marketing materials about us and our services, and about the services of others that we believe you may be interested in. You may opt out of receiving marketing material from us at any time by contacting us in any of the ways specified in that material (or via the contact details below) and we will remove you from our marketing mailing list.

3.5. Sharing personal information ?

We disclose your personal information to:

- your authorised representative(s) where you, or an appropriate third party, notify us in writing to do so;
- insurers for the purpose of benefits payable or other third parties for billing/accounting purposes (e.g. Medicare, workers' compensation insurers, transport accident insurers, private health funds);
- our professional advisors (e.g. auditors and legal advisors);
- contractors who provide services to our business operations (e.g. software suppliers of our systems);
- government and regulatory authorities and other organisations, where required or authorised by or under an Australian law; and
- our Authorised Technology Partners.

B2: Former Staff and Candidates

This Section B2 applies to Former Staff and Candidates

This Section B2 applies to Former Staff and Candidates. Where the employee record exemption applies under the *Privacy Act*, the Australian Privacy Principles may not apply to certain records and practices relating to employees and former employees of I-MED in Australia. If you are a prospective or former employee and you have any questions in relation to our handling of your personal information, please contact HR@i-med.com.au or use the contact information in Section **Error!** **Reference source not found.** (Questions, complaints and contact details).

3.6. What kind of information do we collect and hold about you?

The personal information (including sensitive information) we collect and hold about you may include:

- **identity and other general personal information** – such as your name; contact details; sex; gender; date of birth; role or profession; place of employment.
- **health information** – including any information about your health such as vaccination status and results of any drug and alcohol tests, allergies or dietary requirements that you have provided to us.
- **recruitment information** – any information related to assessing your job application (for example, your working history, qualifications and the results of any police or background checks).
- **payment information** – e.g. bank account and superannuation fund details for prospective employees.
- **employment information** – such as your tax file number, visa and work rights status.



3.7. How do we collect and hold personal information ?

We may collect personal information (including sensitive information) about you from:

- you (e.g. when you contact us by phone, email or our websites, or when you submit a job application);
- recruiters;
- the referees you provided when applying for a job with us; or
- police or background check organisations.

When we collect your personal information (including sensitive information) from someone else, we do so on the basis that they have your consent to provide the information to us or are otherwise required or authorised by law to provide it to us.

3.8. Why do we need your personal information ?

The main reason we collect, hold, use and disclose your personal information (including sensitive information) is for the management of our recruitment processes, the engagement of and provision of services to us by our contractors and their employees, and the maintenance of employee records.

3.9. Use of personal information ?

We use your personal information (including sensitive information) to:

- determine whether to make you an offer of employment or engage you under a contract if you apply for a role or position with us;
- carry out administrative services (e.g. payroll, billing, practice accreditation and statistical analysis);
- comply with laws and assist government or law enforcement agencies where we are required or authorised to do so; and
- manage our security and risks such as supporting the management of our information security and network procedures to prevent cyber-attacks, unauthorised access and other criminal or malicious activities.

3.10. Sharing personal information ?

We may disclose your personal information (including sensitive information) to:

- the referees you provided when applying for a job with us;
- our third party service providers as may be necessary to progress your job application;
- government and regulatory authorities and other organisations, where required or authorised by or under an Australian law; and
- relevant authorities to undertake police or background checks.

4. Section C: How we manage Personal Information

4.1. Storage

We store personal information (including sensitive information) on paper and electronically. We take steps to protect your personal information (including sensitive information) from misuse, interference, loss and from unauthorised access, modification or disclosure. While we take steps to protect your information, we cannot guarantee or warrant the security of any information you or we transmit via the Internet or by email.

4.2. Overseas disclosures

In performing some of our operational business activities we use some service providers located outside of Australia. Your personal information (including sensitive information) may need to be disclosed to them strictly for these purposes. The main countries where those overseas service



providers are located are New Zealand, the Philippines, the United Kingdom, the United States and Canada. We require those offshore service providers to comply with I-MED's privacy and confidentiality requirements. Where your information is disclosed to third parties overseas, it will be done so only to the extent necessary to fulfil the purpose of the disclosure.

4.3. Cookies and use of our website

Our website includes pages that use cookies which are small files that store information on your computer, mobile phone or other device.

We may use them to recognise you across devices and browsing sessions.

We may also use third party analytics tools to help us gather and analyse this information.

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. If you refuse the use of cookies in this way you may not be able to access the full functionality of our website. Please refer to your internet browser's instructions or help screens to learn more about these functions.

Our website may contain links to websites operated by third parties. Those links are provided for your convenience and may not remain current or be maintained. We have no control over and are not responsible for any content or privacy practices of those linked websites. As the privacy policies that apply to those other websites may differ substantially from ours, we encourage you to read them before using those websites.

4.4. Retention of information

We take a number of measures designed to keep your personal and sensitive information secure. I-MED is subject to strict obligations under certain State and Territory laws for creating and maintaining health information and records.

Generally, as a minimum, we keep health information as follows:

- in the case of health information collected while an individual was an adult – for at least 7 years from the last occasion we provided health services to the individual; or
- in the case of health information collected while an individual was under the age of 18 years – at least until the individual turns 25.

Prior medical images of you are important to help identify changes in you over time, to detect abnormalities, and monitor the effectiveness of treatments. Prior images of you are currently not able to be stored in your MyHealth Record.

4.5. Managing your personal information

You may request access to, request a copy of or ask us to correct or update your personal information (including sensitive information) at any time. We will ask you to verify your identity before the information is provided or changes are made. If you are a patient, we recommend that you obtain any results from your Referrer, who is in the best position to explain them to you knowing all of your medical history. On this basis, your radiology report will be made available to you 7 days after it has been made available to your Referrer.

Requesting access can be done by contacting any I-MED clinic if you are a patient. If you are not a patient, please refer to the contact details below or visit your closest I-MED clinic. If we refuse your request for access to or correction of your personal information, we will tell you why and advise you of any next steps. You may complain about our refusal, see Section **Error! Reference source not found.** (Questions, complaints and contact details).

We try to respond to your access or correction requests within 30 days of your request. If it will take longer than this, we will let you know.

Where we are not able to fulfil your request to access or correct your information for a legal or other reason, we will let you know why.



4.6. Questions, complaints and contact details

If you have a question or complaint about your privacy or how we have dealt with your information, please use the form provided by our clinic staff or the form available online.

I-MED Radiology Network

Attention: Privacy Officer

GPO Box 514, Sydney NSW 2001

Email: privacy@i-med.com.au

Website: [Your Privacy | I-MED Radiology Network](#)

Any complaint will be investigated, and a response will be sent to you.

If you're not happy with the way we handle your query or your information (including our response to your request to access or correct your personal information), you have a right to lodge a complaint with the Office of the Australian Information Commissioner – visit oaic.gov.au.

4.7. Changes to this Privacy Policy

We are related to the following companies:

I-MED Queensland Pty Ltd	ABN 79 010 928 613
I-MED Central Queensland Pty Ltd	ABN 64 088 326 514
Cairns Radiology Pty Ltd	ABN 71 127 377 066
I-MED New South Wales Pty Limited	ABN 45 095 617 244
I-MED Services Pty Limited	ABN 24 100 434 991
I-MED Victoria Pty Limited	ABN 19 080 845 594
I-MED Western Australia Pty Ltd	ABN 40 128 525 075
I-MED Regional Pty Limited	ABN 81 095 630 792
I-MED Northern Territory Pty Ltd	ABN 99 084 845 787
Alfred Medical Imaging North Sydney Pty Ltd	ABN 42 613 135 998
I-TeleRAD Pty Ltd	ABN 86 087 098 717

This Privacy Policy is effective from 3 February 2025. We may make changes to this Privacy Policy, our processes, or systems. Significant changes will be notified on our website. You should review our Privacy Policy on our website [Your Privacy | I-MED Radiology Network](#) from time to time. Any changes will be effective from the date they are made or otherwise stated.