

# Best Health Solutions Privacy Policy

Last updated: 10 August 2020

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## 1 Best Health Solutions commitment to privacy

- 1.1 Best Health Solutions Pty Ltd (trading as Best Health Solutions), its subsidiaries and affiliates in Australia (collectively referred to as **BHS**) are committed to managing personal information in accordance with the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**) and in accordance with other applicable privacy laws.
- 1.2 This document sets out our policies for managing the personal information of Patients (defined below) and others who provide personal information to us and is referred to as our privacy policy (**Privacy Policy**).
- 1.3 In this Privacy Policy, "we" and "us" refers to BHS and "you" or "Patient" refers to any individual about whom we collect personal information. We obtain personal information from Patients, our Clients (people or organisations that engage BHS to perform services) and others from time to time.

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## 2 About BHS

- 2.1 BHS offers a complete range of services, including (amongst others) the BESTmed Medication Management System which is made up of the following endpoints:
- 2.1.1 BESTpack - decision support, business rules and automation which enables pharmacist to efficiently and accurately manage the supply of medications;
- 2.1.2 BESTdose - enables facilities to dose a doctors' order and receive sophisticated intelligence for medication incident control and continuous improvement as well as standardising processes across multiple sites; and
- 2.1.3 BESTdoctor - enables prescribers to manage resident medication charts, communicate with Facilities, and report on resident medication use.

(collectively, the **Systems**).

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## 3 What information does BHS collect about you?

### 3.1 Clients and prospective clients

- 3.1.1 When you enquire about our Systems or when you become a Client of BHS, a record is made which may include your personal information.

- 3.1.2 The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:
- (a) your name, e-mail, postal address and other contact details;
  - (b) information about your employer or an organisation who you represent;
  - (c) your professional details;
  - (d) information about your employees; and
  - (e) any additional personal information you provide to us, or authorise us to collect, as part of your interaction with BHS.

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## 4 What information BHS collects about Patients

- 4.1.1 BHS collects personal information about other individuals who are not Clients of BHS. This primarily includes patients and customers of nursing homes, pharmacies and hospitals who use our Systems (**Patients**).
- 4.1.2 The kinds of personal information we collect about Patients may include a Patient's:
- (a) name;
  - (b) contact details;
  - (c) medical history and medical conditions;
  - (d) pharmaceutical prescriptions; and
  - (e) information regarding interactions and transactions with Clients, BHS and their nursing home, pharmacy or hospital.
- 4.1.3 Information BHS collects about Patients is considered sensitive information. For example, Patients' medical history and prescriptions etc. BHS takes the steps set out at section 8 of this Privacy Policy to protect Patients' personal information.

4.1.4 We also collect personal information about Patients who are children. Where children do not have sufficient maturity and understanding to make decisions about their personal information, we will require Clients to ensure their parents or guardians make decisions on their behalf.

it is not practicable for BHS to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our Systems or participate in our events, programs or activities we manage or deliver.

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**5 How and why does BHS collect and use your personal information?**

- 5.1 BHS collects personal information reasonably necessary to carry out our business, to assess and manage our Clients' needs, and provide services including the Systems set out at section 2 of this Privacy Policy. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you and / or third parties and managing Client relationships.
- 5.2 BHS generally collects personal information directly from users of our Systems. We may collect and update personal information over the phone, by email, or in person.
- 5.3 BHS also collects and uses de-identified personal information for research purposes and to innovate our delivery of products and Systems.

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**6 How does BHS interact with you via the internet?**

- 6.1 You may visit our website ([bestmed.com.au](http://bestmed.com.au)) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to BHS will be managed in accordance with this Privacy Policy.
- 6.2 BHS websites use cookies. A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites.
- 6.3 You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our websites.
- 6.4 BHS websites may contain links to third-party websites. BHS is not responsible for the content or privacy practices of websites that are linked to our websites.

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**7 Can you deal with BHS anonymously?**

BHS will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally,

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**8 How does BHS hold information?**

- 8.1 BHS stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third-party storage providers based in Australia). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.
- 8.2 BHS maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.
- 8.3 Patient information held on our Systems is protected by encryption and all users of our Systems agree to keep this information confidential and to only use Patients' information in accordance with the provisions of the Privacy Act and APPs.
- 8.4 We periodically take steps to destroy or de-identify information that we no longer require.

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**9 Does BHS use or disclose your personal information for direct marketing?**

- 9.1 BHS may use or disclose your personal information for the purpose of informing you about our Systems, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.
- 9.2 If you opt-out of receiving marketing material from us, BHS may still contact you in relation to its ongoing relationship with you.
- 9.3 BHS does not use Patients personal information for direct marketing.

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**10 How does BHS use and disclose personal information?**

**10.1 For clients**

The purposes for which we may use and disclose your personal information will depend on the Systems we are providing you. For example, if you have engaged us to provide a System, we may disclose information about you to service providers where this is relevant the delivery of to our Systems.

**10.2 For Patients of users of our Systems**

BHS discloses Patients' personal information or sensitive information to authorised users of our System. BHS does not own or disclose Patients personal or sensitive information to anyone who is not an authorised user of our Systems. Authorised users of our Systems agree that any information they obtain about Patients while using the Systems will be used in accordance with and not breach any provision of the Privacy Act or APPs.

**10.3 Disclosure to contractors and other service providers**

10.3.1 BHS may disclose information to third parties we engage in order to provide our Systems, including contractors and service providers used for data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance / development, printing, archiving, mail-outs, and market research.

10.3.2 Personal information may also be shared between related and affiliated companies of BHS, located in Australia.

10.3.3 Third parties to whom we have disclosed your personal information and/or Patients' personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

**10.4 Use and disclosure for administration and management**

BHS will also use and disclose personal information for a range of administrative, management and operational purposes. This includes:

- 10.4.1 administering billing, payments and debt recovery;
- 10.4.2 planning, managing, monitoring and evaluating our Systems;
- 10.4.3 quality improvement activities;
- 10.4.4 de-identified Patient information for statistical analysis, reporting and benchmarking;

- 10.4.5 training staff, contractors and other workers;
- 10.4.6 risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- 10.4.7 responding to enquiries and complaints regarding our Systems;
- 10.4.8 obtaining advice from consultants and other professional advisers; and
- 10.4.9 responding to subpoenas and other legal orders and obligations.

**10.5 Other uses and disclosures**

We may use and disclose your personal information and Patients personal information for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.

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**11 Does BHS disclose personal information overseas?**

11.1 BHS is a national organisation and works with customers, service providers, sponsors and commercial interests across Australia. Personal information will not be disclosed to overseas recipients.

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**12 Does BHS delete information**

- 12.1 BHS may delete any information or data that relates to any account that has been deleted or cancelled (but not merely inactive) for a period exceeding 30 days.
- 12.2 BHS may delete any information or data that relates to any account that been inactive for a period exceeding 24 months.

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**13 How can you access or seek correction of personal information?**

- 13.1 You are entitled to access your personal information held by BHS on request. To request access to your personal information please contact the user of our Systems our Privacy Officer using the contact details set out below.
- 13.2 You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.
- 13.3 We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting a user of our Systems or us know if you notice errors or discrepancies in information we

hold about you and letting us know if your personal details change.

- 13.4 However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information. Please note that the users of our Systems are also able to update your personal information and we recommend contacting them in first instance.
- 13.5 We may decline your request to access or correct your personal information in certain circumstances in accordance with the APPs. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

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#### **14 What should you do if you have a complaint about the handling of your personal information?**

- 14.1 You may contact BHS at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.
- 14.2 You may make a complaint about privacy to the Privacy Officer at the contact details set out below.
- 14.3 The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.
- 14.4 If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.
- 14.5 In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.
- 14.6 If you are not satisfied with our response to your complaint, or you consider that BHS may have breached the APPs or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner (**OAIC**). The OAIC can be contacted by telephone on 1300 363 992 or by using the contact details on the [OAIC website](#).

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#### **15 How changes are made to this privacy policy?**

BHS may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes.

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#### **16 How can you contact BHS?**

The contact details for BHS are:

Jay Hijazi  
 11 East Street, Granville, NSW 2142  
*info@besthealthsolutions.com.au*  
 (02) 9637 3797