



## Privacy Policy

**Effective:** 18 May 2023

This is the Privacy Policy of Juno Healthcare Pty Ltd (ACN 662 160 063), who may be referred to as "Juno", "we", "us" and "our".

Juno provides healthcare services. Juno also provides innovative healthcare administration services to facilitate the efficient supply of quality health services, improve patient experience, optimise resources, simplify processes, and promote efficiency in the health system. Juno achieves this by operating and managing technology infrastructure, a network of clinicians and health service providers, contractors, hospitals, and administration services so that patients don't have to.

This Privacy Policy sets out how we collect, use, store and disclose personal information as part of our business. If you provide Juno with personal information, or if you become part of Juno's ecosystem as a patient, service provider, worker, contractor or in some other capacity, you are agreeing to our handling of personal information in accordance with this Privacy Policy.

Juno is committed to complying with applicable privacy laws. As a health service provider, we are bound by various relevant legislation, such as:

- the *Privacy Act 1988* (Cth)
- the *Health Records Act 2001* (Vic)
- the *Mental Health Act 2014* (Vic)
- the *My Health Records Act 2012* (Cth) if we implement MyHealth Records.

We are committed to complying with our legal obligations and require all our third-party service providers (via contracts) to comply with applicable privacy legislation, too.

Over time, we will update this Privacy Policy by publishing updates (effective immediately) on our website. It is your responsibility to check for updates to the Privacy Policy. We will use reasonable efforts to bring to your attention any major changes which impact you, by email to the address (if any) we have in our records.

## Useful Links

Use the contents and links below to skip to the information most relevant to you:

[I am a patient or prospective patient](#)

[I am a Juno clinician](#)

[I work for a Juno service provider, business customer or business partner](#)

[I am a Juno employee or contractor](#)

[I am applying for a job or role with Juno](#)

[I don't fit into the above categories](#)

[I am using the website](#)

*General information (applicable to everyone)*

[Storage and security of data](#)

[How to request access to personal information](#)

[How to make an enquiry or complaint about personal information handling](#)

[Contact us about privacy and records](#)

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## Patients and prospective patients

We generally only collect personal information we need to provide you with Juno services. In this section:

[What personal information we collect and how](#)

[How we use the personal information](#)

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## What personal information we collect and how

**Registration.** To use the Juno Platform, you must register. During the registration process, we collect personal information from you directly (or from the representative using the Juno Platform on your behalf) via an online registration form which requests your full name, title, sex, date of birth, contact details (including an email address, postal and physical address details, and telephone number(s)), details of your referring doctor, the applicable details of your healthcare funding arrangements (i.e.. your Medicare number, private health insurer and membership number, health care card or pension card number, WorkCover or TAC claim number), the full name and contact details of your next of kin, and details of your medical history, current medications, and allergies. We will also usually collect a [referral](#) from your GP, hospital, or other healthcare provider as relevant to our provision of healthcare services to you.

**Telehealth Bookings.** We collect details of the services you register for via the Juno Platform. For example, when you schedule appointments using the Juno Platform, we record the identity of the clinician you make an appointment with and their specialty (e.g. gastroenterology specialist or a dietician), the booking time, the nature of the consultation, and any other comments you record in the Juno Platform.

**Telehealth Consultations.** We collect personal information during telehealth consultations conducted via the Juno Platform videoconferencing facilities. During a telehealth consultation:

- Unless you have specifically consented to it, no recordings of the consultation will be made and stored. You are not permitted to make recordings of the consultation yourself.
- Your clinician will make clinical notes and provide them to Juno. They may include a record of your reported medical conditions, symptoms, current medications, medical history, any other clinically relevant information requested of you, and any other information you choose to provide, as well as clinical observations, recommendations, assessments, diagnoses, and treatment options determined by the clinician. These notes may incorporate information about you which is already recorded in the Juno Platform, such as information from your [referral](#). Your clinician is required to store this information only within the Juno Platform as part of your record, and not in a separate medium (for security reasons).
- Juno collects metadata about your consultation such as consultation duration, whether it proceeded via videoconference or phone, or if it did not proceed.

Buying services. You may choose to access services behind a “paywall” within the Juno Platform or book an appointment you need to pay for. If you do, we may ask you for additional personal information we need to provide you services you request including payment information, such as credit card details, which are collected from you via online forms within the Juno Platform.

Other Platform Data. We also collect:

- certain data automatically (such as your device and browser details, and data about your interactions with our website and Platform) via electronic means when you use the Juno Platform (as described in the [Website Privacy](#) section); and
- if you choose to provide us with any feedback or suggestions about the Juno Platform or Juno services, that feedback.

Related health service providers. We will usually collect personal information directly from you. Sometimes, where this is standard practice in the healthcare industry and reasonable, we collect personal information about you from third party health service providers, such as your GP, a referring hospital, or another health service you have engaged with in relation to the treatment you receive through Juno. We will do this:

- if you have been referred to Juno by another clinician or healthcare provider outside Juno; Medicare requires that we receive an up-to-date [referral](#) in order to provide you services. The referral may be provided by you, or sent directly to us by your healthcare provider;
- if a Juno prescription is dispensed from a pharmacy outside Juno (e.g. a hospital pharmacy), Juno will receive your full name, date of birth, hospital “UR” identification number (if applicable) and the prescription details, for the purpose of invoicing;

- if Juno has referred you to a service provider for pathology, radiology, in-home physiotherapy or in-home nursing services, Juno will collect details of your results from those service providers to monitor your health statistics as relevant to Juno's provision of healthcare services to you;
- if Juno integrates with the MyHealth Record system operated by the Australian Government, Juno may retrieve information relevant to your treatment stored in your MyHealth Record; and
- otherwise, if you have authorised us to.

## Referrals

As a specialist care provider, we only provide patient services on referral from another health service provider. When we say "**referral**," we mean a written referral from one health service provider to another which contains personal information about you, and it includes any related information provided by a health service provider to support or supplement a referral. This personal information will usually include details such as:

- your title and full name
- your contact details such as address and phone number
- your date of birth and/or age
- your sex and/or gender
- your patient "UR" number if you are referred by a hospital, or your GP details if referred by a GP;
- your Medicare card number
- whether you require an interpreter and your spoken language(s)
- the details of the health services you are being referred for and the identity of the health service provider and practitioner making the referral
- health information about you which is relevant to the referral, such as current medical conditions, treatments, prescriptions, symptoms, allergies, relevant clinical notes and observations, health goals or concerns and relevant medical history, and previous diagnostic and surgical reports.

Juno might give or receive a referral concerning you. Referrals may be sent directly between healthcare providers or may be provided to you to take with you to a healthcare provider. If unsure about referrals, you should ask to review a referral before your health service provider issues it.

## How we use personal information

The personal information we collect from you as a patient or prospective patient is collected, stored, used, and disclosed for the following purposes (as is fair and appropriate) in line with standard healthcare industry practices:

### *Service Provision and Account Management for you*

- your ongoing healthcare;
- verifying your identity when we communicate with you;
- enabling you to access the Juno Platform ([registration details only](#)), providing and administering the Juno Platform, providing you with Juno Platform support and detecting and investigating Juno Platform misuse;
- providing or facilitating services that you request Juno to provide or organise for you and ancillary services;
- billing you or your health insurers, Medicare, or other health service providers (such as hospitals) for services we provide or facilitate for you, or enabling your health insurers or other health service providers (such as hospitals) to recover fees and funding for the services that were provided to you;
- communicating with your other health service providers about your care where appropriate;
- storing clinical and health records concerning services provided to you or scheduled for you by Juno, and payments (or payment arrangements) for those services;
- sending you (via email, SMS, or phone call) administrative messages, appointment reminders or changes, notices about service or contract updates, Privacy Policy updates, payment or other account management reminders, security alerts and legal notices relating to the Juno Platform or services you receive from us;
- auditing, evaluating, and improving the quality and efficiency of services we provide or arrange for you;

### *General purposes*

- monitoring your use of the Juno Platform to identify and analyse usage and demand patterns and trends, errors and bugs, user behaviours and consumer insights, and to inform potential improvements, enhancements, additions, design features, structure and content for the Juno Platform and other Juno services, and for Juno marketing (but not in a manner that identifies you personally);

- optimising, improving, enhancing, and informing Juno health and administrative services, and clinician and service provider training (but not in a manner that identifies you personally);
- performing health-related analysis and research including via the use of artificial intelligence and machine learning tools (in accordance with applicable ethical guidelines and laws) for research, education, marketing, quality assurance, service improvement and patient care improvement purposes, provided that data is only used in de-identified and aggregated form where names, addresses and other personal identifiers have been removed and no individual can be identified from the data;

#### *Other*

- seeking legal and professional advice, and investigating, responding to, and resolving disputes, claims and regulatory investigations;
- complying with legal obligations and regulatory reporting requirements;
- maintaining Juno's ordinary business records in accordance with applicable laws; and
- managing and enforcing agreements we have with you, service providers or others.

We will never sell your personal information.

## Who we disclose personal information to

When we disclose your personal information outside Juno, we will only do so for the purposes identified above. More specifically, your personal information might be shared outside Juno to:

- Juno clinicians involved in your care, so they can provide you well-informed and appropriate healthcare services and advice;
- the hospital, health service, GP or other practitioner that referred you to us, or outsourced part of your care or treatment to us, so that they have all evidence of the services we provided for billing and reporting purposes;
- payment systems operators, who need your payment (e.g. credit card) and related details in order to process payments for services you purchase from us;
- your referring/treating GP or specialist outside Juno, to facilitate your ongoing healthcare and treatment outside Juno;
- Medicare and other government departments you have an arrangement with to facilitate or fund your medical care, and your private health insurer;

- if/when Juno integrates with the Australian Government's MyHealth Record, the MyHealth Record system for the purpose of uploading your records (unless you have opted out);
- to Juno and Juno clinicians' lawyers, professional advisers, and insurers for the purpose of receiving advice, enforcing contracts, and handling claims or disputes;
- to government bodies, regulators and law enforcement where required or permitted by law (e.g. where Juno is legally obliged to report or disclose something);
- to Juno subcontractors, consultants, agents, suppliers, and outsourced service providers, to enable them to carry out tasks, functions, and activities on behalf of Juno (including data and records storage) and to supply and provide support for their products, manage related security matters and for incidental business operations;
- to service providers which Juno organised for you, for example, if Juno organises in-home nursing or physiotherapy visits or pathology or medical imaging services for you, Juno will provide sufficient details to enable the service provider to schedule an appointment with you and provide the requested services.

For more detailed information about what we disclose to who and when, [Contact Us](#).

Juno does not control how third parties such as those listed above, handle your personal information. However, we take reasonable steps to ensure that it is handled appropriately, for example, by making sure our service provider contracts require service providers to comply with privacy laws and take appropriate security measures. We also have policies in place to help ensure that we only share the minimum information we need to. For more details, contact the third-party providers directly, or [Contact Us](#) to find out more about what arrangements we have in place with them.



# Clinicians

In this section:

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## What personal information we collect and how

If you are a Juno clinician, you might be an employee of Juno or a contracted service provider. If you are an employee, this section does not apply to you – please refer to the [Juno Employees](#) section.

If you are a contracted service provider:

- Juno collects various information from you as set out in your Juno Services Agreement (the agreement between you and Juno concerning your use of Juno services to provide health services), including:
  - your contact information, your practice details (including its location, your healthcare specialty, and your provider number), your bank account number for fee payments, the nature of services you will provide as a Juno clinician and other data included as part of your “Onboarding Information” such as your qualifications, accreditations, and licences relevant to your practice;
  - information in “Background Checks” which may include the result of police checks, checks on your eligibility to work in Australia and information provided by referees you nominated, which we collect from specified third party sources with your consent;
  - details of notifications, complaints, investigations, and regulatory action concerning your healthcare practice, such as the details of any complaint

made by a patient to AHPRA, which you are required to notify us of under your Juno Services Agreement;

- the fees you will receive for services you provide as a Juno clinician, as detailed in your Juno Services Agreement, or agreed with us;
  - any allegations made against you in a complaint or enquiry made by or on behalf of a patient, as disclosed to us by the complainant;
  - any feedback you give Juno about Juno services or the Juno Platform.
- Juno collects details from you during the Juno Platform registration process, including your name, title, contact details, (including a practice email address, postal and physical address, and telephone number(s)), and practitioner number. We collect this data via an online web form you complete within the Juno Platform or via an electronic form you complete and email to Juno.
  - The details of the services you provide to Juno patients and the fees and Medicare income you receive in respect of them, are collected and viewable in the Juno Platform based on data you have input into the Juno Platform.
  - If you provide telehealth services via the Juno Platform, we will:
    - collect metadata concerning the consultation such as consultation duration, whether it proceeded via videoconference or by phone, or if it did not proceed;
    - not record telehealth consultations. You (and patients) are not permitted to record telehealth consultations except as authorised by us (and with express consent from the patient); and
    - collect your clinical notes and any other material you input into the Juno Platform concerning the consultation.
  - When you use the Juno Platform, we will collect:
    - certain data automatically (such as your device and browser details, and data about your interactions with our website and Platform) via electronic means when you use the Juno Platform (as described in the [Website Privacy](#) section);
    - if you choose to provide us with any feedback or suggestions about the Juno Platform or Juno services, that feedback.

## How we use personal information

Juno uses your personal information to:

*Clinician relationship management*

- enable you to access the Juno Platform ([registration details only](#)), to provide and administer the Juno Platform, to provide you with Juno Platform support and to detect and investigate Juno Platform misuse;
- administer, enforce, and manage your Juno Services Agreement and Juno's provision of quality healthcare and services to patients;
- ensure clinicians meet applicable quality and regulatory standards, to ensure the safety of patients and to investigate complaints and enquiries concerning you or the services you provide;
- support Juno's provision of services, including Juno's billing and reporting to Medicare, private health insurers, patients, and hospitals;
- send you (via email, SMS, or phone call) administrative messages, appointment reminders or changes, notices about service or contract updates, Privacy Policy updates, payment and other account management reminders, security alerts and legal notices relating to the Juno Platform or services you receive from us;
- improve the quality and efficiency of services we provide you;

#### *General purposes*

- maintain and use accurate clinical and health records concerning patient services and payments made for those services, and to identify the clinician(s) who provided services to patients;
- monitor your use of the Juno Platform to identify and analyse usage and demand patterns and trends, errors and bugs, user behaviours and consumer insights, and to inform potential improvements, enhancements, additions, design features, structure and content for the Juno Platform and other Juno services, and for Juno marketing (but not in a manner that identifies you personally);
- optimise, improve, enhance, and inform Juno health and administrative services, and clinician and service provider training (but not in a manner that identifies you personally);
- perform health-related analysis and research including via the use of artificial intelligence and machine learning tools (in accordance with applicable ethical guidelines and laws) for research, education, marketing, quality assurance, service improvement and patient care improvement purposes, provided that data is only used in de-identified and aggregated form where names, addresses and other personal identifiers have been removed and no individual can be identified from the data;

#### *Other*

- seek legal and professional advice, and investigate, respond to, and resolve disputes, claims and regulatory investigations;
- comply with legal obligations and regulatory reporting requirements;
- maintain Juno's ordinary business records in accordance with applicable laws;
- manage and enforce agreements we have with you or other parties.

We will never sell your personal information.

## How we disclose personal information

We disclose personal information for the purposes described above. Specifically, we may disclose personal information to other parties as follows:

- since patient referrals and other patient records held by Juno contain your name (and other details such as your specialty, practice details and qualifications), those details may be shared with any person that a patient record can be shared with, including patients, their other health service providers, other Juno clinicians and anyone a patient chooses to share their records with;
- to Juno subcontractors, consultants, and service providers to the extent reasonably necessary for those parties to carry out tasks, activities, and functions on Juno's behalf (including records storage, background checks) and to supply and provide support for their products, manage related security matters and for incidental business operations;
- to patients, hospitals, Medicare, and private health insurers in connection with your provision of services and our billing of those services;
- to Juno's lawyers, professional advisers, and insurers to receive advice, and to make, respond to and resolve investigations, claims and disputes;
- to government, regulators and law enforcement where required or permitted by law (e.g. for regulatory investigations, mandatory reporting and complying with court orders and warrants); and
- to anyone Juno transfers its business or assets to, to enable them to carry on Juno's business and relationship with you.

# Service provider, business customer and business partner personnel

In this section:

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## What personal information we collect and how

If you work for a business customer, service provider, contractor, or business partner of Juno, or for a business customer such as a referring hospital, then Juno may collect limited personal information about you from your employer, such as your full name, position title and qualifications, and business contact details such as email address and phone number.

## How we use personal information

Your personal information is used for the purpose of administering our relationship with your employer. This may include us arranging services, receiving services, or communicating about services your employer provides, identifying you as the person who will provide or provided particular services, or otherwise administering the contractual relationship we have with your employer. We will generally only use your personal information to contact you for business purposes connected with your role and to identify your business role or identify you as a service provider, in our records.

In limited circumstances, we may also use your personal information to:

- seek legal and professional advice, and investigate, respond to, and resolve disputes, claims and regulatory investigations;
- comply with legal obligations and regulatory reporting requirements;

- maintain Juno's ordinary business records in accordance with applicable laws; and
- manage and enforce agreements we have with your employer or other parties.

We will never sell your personal information.

## How we disclose personal information

Juno may verify your details with your manager or another employee or representative of your business.

- Juno may disclose your personal information to: Juno clinicians and staff (who may not all be employees), to enable them to carry out Juno's business and functions;
- to business partners, business customers, service providers or health services who refer or receive referrals from us, as part of a patient's records or referral information, or otherwise if there is a reasonable need to be able to contact you in relation to a patient's care;
- lawyers, professional advisers and insurers of Juno or its clinicians for the purpose of receiving advice, enforcing contracts, and handling claims or disputes;
- government bodies, regulators and law enforcement where required or permitted by law (e.g. where Juno is legally obliged to report or disclose something); and
- Juno subcontractors, consultants, agents, suppliers, and outsourced service providers, to enable those persons to carry out tasks, functions, and activities on behalf of Juno (including data and records storage) and to supply and provide support for their products, manage related security matters and for incidental business operations.

## Employees and applicants

This section applies to Juno employees, contractors, job applicants and volunteers. Juno will handle employee personal information in accordance with the requirements of applicable legislation including the *Fair Work Act 2009*.

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### What personal information we collect and how

We collect the personal information you provide us when you apply for a role (e.g. in your CV) and as part of your ongoing engagement with us. Mostly, we will receive details from you directly but in some cases, we might receive it from a third party as discussed below. The information we collect may include:

- your full name
- contact details including your address, phone number and email address
- your qualifications and registrations, accreditations, and licence details relevant to the role
- your employment history
- your vaccination status and related records
- your medical records concerning medical fitness for the role, your absences from work due to medical conditions or injuries, and related records
- opinions about your performance or capability at work, collected from your nominated referees

- the result of background checks, such as police checks, which we may collect from relevant authorities or third parties (such as intermediary service providers who arrange background checks and results on our behalf)
- any personal information you choose to share with Juno or store on Juno's systems, including if you use Juno equipment to access documents, emails, and other content (even though it may not be connected with your employment).

## How we use personal information

For employees, contractors, and volunteers, we use your personal information to assess your suitability for a role, for the ongoing management of your employment, and as reasonably required for us to operate our business. We may also use your personal information in other ways as communicated to you via our workplace policies. For job applicants, we use your personal information to assess your suitability for a role and communicate with you about it.

## How we disclose personal information

We may disclose your personal information as follows:

- to our service providers and contractors (e.g. third party service providers who handle and store records on our behalf), to enable them to carry out functions, tasks, and activities on Juno's behalf;
- to business partners, service providers, patients, clinicians, and contractors as reasonably necessary or convenient to identify and appoint you as a representative of Juno, and for Juno to function (and for you to perform your role);
- to patients and their healthcare providers, so that they can understand which Juno personnel have been involved in their care;
- to Medicare and government agencies for routine reporting and disclosure purposes;
- to anyone for the purpose of identifying that you are a Juno employee, volunteer, or contractor;
- to Juno and Juno clinicians' lawyers, professional advisers, and insurers for the purpose of receiving advice, enforcing contracts, and handling claims or disputes; and
- to government bodies, regulators and law enforcement where required or permitted by law (e.g. where Juno is legally obliged to report or disclose something); and
- as stated in our workplace policies (if you are an employee).





## Other Enquirers

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## What personal information we collect and how

There may be circumstances where we receive enquiries from you or contact you outside the relationships contemplated elsewhere in this policy, whether by phone, email or via the website. Examples of communications that could fall into this category are set out in the table below:

<b>You...</b>	<b>Personal information we collect:</b>
... contact us for general service and business enquiries (not connected with a patient)	Only the personal information you choose to share; usually, your name and contact details (telephone number or email address).
... are making an investor, customer, or business partner enquiry	As above, and we may also collect the details of the organisation you represent and your role with them.
... communicate with us (or we contact you) in your capacity as the next of kin, legal guardian, relative, and/or emergency contact of a patient	We may collect your full name, contact details (phone number, email address, postal address) and relationship with the patient, either from you directly or the patient.
... have been nominated as a referee or former employer of an applicant for employment, contracting or volunteering with us	We will generally receive your full name, contact details (which may include phone number, email address and postal address), position title and employer details from the

	applicant.
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## How we use personal information

Most enquiries in this category are made for a specific reason. For example, you may have a question for us about our business, need an update about your relative, or we may have a question for you about someone's suitability for a role with us. Generally, we will only use your personal information for that purpose; i.e. the purpose we collected it. If your enquiry relates to a patient, we may retain your details as part of our patient records.

## How we disclose personal information

We may disclose your personal information to:

- Juno clinicians and staff (who may not all be employees), to enable them to carry out Juno's relevant business functions, including responding to your enquiry;
- to business partners, business customers, service providers or health services who refer to or receive referrals from us, as part of a patient's records or referral information (if your enquiry relates to a patient), or otherwise if there is a reasonable need to be able to contact you in relation to a patient's care;
- lawyers, professional advisers and insurers of Juno or its clinicians for the purpose of receiving advice, enforcing contracts, and handling claims or disputes;
- government bodies, regulators and law enforcement where required or permitted by law (e.g., where Juno is legally obliged to report or disclose something); and
- Juno subcontractors, consultants, agents, suppliers, and outsourced service providers, to enable those persons to carry out tasks, functions, and activities on behalf of Juno (including data and records storage) and to supply and provide support for their products, manage related security matters and for incidental business operations.

## Storage and Security

Regardless of your relationship with us (whether you are a patient, service provider, business partner or otherwise), the personal information we hold is stored and managed in the same way.

### Storage and security

Generally, we only store your personal information in electronic form. We use top-tier, globally recognised and secure cloud service providers who store our records using data centre infrastructure located in Australia. We store your personal information in Australia, but not necessarily within Victoria. We will generally avoid disclosing personal information outside Australia. However, our cloud service providers might occasionally transfer some data overseas (anywhere in the world where their subprocessors operate) as needed to support their specific service or function, or related security monitoring. In some limited circumstances, disclosure outside Australia may also occur, for example, if your private health insurer is located overseas and we need to communicate with them for the purposes of your care as a patient. While overseas parties may not comply with Australian privacy laws, we take reasonable steps to ensure that they deal with your personal information consistently with Australian Privacy Principles (for example, through our contracts with them).

Generally, we don't use or encourage the use of hard copy records for security and records integrity reasons. We don't use faxes. Hard copy records may occasionally be created for temporary use, however, such as handwritten notes, printouts of information stored electronically, or communications in the event of technology or network failures.

### Security

We take reasonable steps to protect personal information from misuse, unauthorised access or modification, and loss.

For example, with respect to electronic records:

- we host our data with top-tier, globally recognised and secure cloud hosting providers with high security standards (meeting the requirements of ISO 27011, ISO 27002 and ISO 27018 standards), and encryption for data at rest and in transit;
- we limit access to our records to authorised personnel using role-based access permissions and password protection with two factor authentication;
- we provide induction training and administer a code of conduct to govern appropriate system and data access and use by our people;

- we have an independent data governance committee to review and determine the appropriate use of data on a case-by-case basis where required (for example, when we conduct research); and
- when we disclose data, we minimise the data we disclose based on what is necessary, practical, and reasonable in accordance with organisational policies and procedures.

Hard copy records created for temporary use are securely destroyed within a reasonable time after they are no longer required.

## Breach

Data breaches will be reported and handled in accordance with legislation such as the notifiable data breach schemes under the *Privacy Act 1988* (Cth) and *My Health Records Act 2012* (Cth), as well as incident reporting requirements under *Security of Critical Infrastructure Act 2018* (Cth) if they are applicable.

## Retention

Juno retains patient records for the period required by applicable legislation (this is generally 7 years). At the end of the statutory retention period, Juno will securely destroy records. If you have questions about Juno's records retention, please [Contact Us](#).

# Accessing your records

In this section:

[General](#)

[Patient \(health\) records](#)

[Employee records](#)

## General

Generally, you can request access to the personal information we hold about you by:

- for patient records (health records), see [Patient Records](#);
- for employee records, see [Employee Records](#);
- if you are a patient or clinician using the Juno Platform, you can view and update some of your details on a self-serve basis by logging into the Juno Platform; or
- [Contacting us](#), if your request relates to something else.

In some circumstances, we are permitted to refuse to provide access to personal information. If we do, we will provide reasons for that refusal in accordance with applicable legislation.

You can also [Contact Us](#) to request that we:

- change your details, such as your contact details, that we have on file;
- correct errors in the information we hold about you, or if we do not agree to amend your personal information (for example, your clinician information and records) append a statement to those records.

## Patient Records

1. To request access to patient records for yourself or on behalf of someone else, [Contact Us](#) and will be required to verify your identity. Please send the form to [admin@junohealthcare.com.au](mailto:admin@junohealthcare.com.au).

The following fees apply for our services in collating and facilitating access to patient records and health information:

Item	Fee (as applicable)
<b>Our time spent collating or assessing information if require in order to attend to your request</b>	Our reasonable costs, capped at 2.5 fee units <sup>1</sup> (or about \$38.22). <sup>2</sup>
<b>Viewing or inspecting health information</b>	<ul style="list-style-type: none"> <li>• collation costs (see above);</li> <li>• 1.2 fee units per 30 minutes <sup>3</sup> (about \$18.34) chargeable for our time supervising your access;</li> <li>• if you require explanation, our normal consultation fees apply.</li> </ul>
<b>Receiving hard copies</b>	<ul style="list-style-type: none"> <li>• collation costs (see above);</li> <li>• generally, 20c per page assuming A4 pages in black and white; <sup>4</sup></li> <li>• postage costs (if you request records be posted).</li> </ul>
<b>Receiving a summary of information</b>	<ul style="list-style-type: none"> <li>• if there isn't a summary already available, our usual time-based consultation fees for preparing the summary (capped at 9.4 fee units or around \$143.72); and</li> <li>• postage costs (if you request records be posted).</li> </ul>

In some circumstances, additional fees may apply but we will let you know before organising your access.

We will issue you an invoice for the applicable fees when we have processed your request.

We will attend to your request as soon as we can; an indicative time frame for responding to requests is 5 business days but we may take longer at busy times.

## Employee Records

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<sup>1</sup> Until 30 June 2023, a "fee unit" is \$15.29. This amount is updated annually by the Treasurer under the *Monetary Units Act 2004*. We will apply the current value of a "fee unit" when calculating applicable charges – amounts given in this document are indications for convenience only.

<sup>2</sup> capped at 2.5 fee units (around \$38.22).

<sup>3</sup> calculated in quarter hour increments or parts thereof.

<sup>4</sup> for other types, we will pass on our reasonable costs (and advise you of those costs).

To request access to your employee records, email [privacy@junohealthcare.com.au](mailto:privacy@junohealthcare.com.au).

## Complaints and Enquiries

If you have an enquiry or complaint about how we handle personal information, please contact us using the details below under [Contact Us](#). We will take reasonable steps to investigate and address your complaint or enquiry in a timely manner. We will also, based on the nature of your enquiry or complaint, provide further information about avenues and external resources available to you if you are not satisfied with how we have handled your enquiry.



## Contact Us

To contact us about accessing or correcting records, personal information, and records management, or to make a related enquiry or complaint, please call or write to us:

Privacy and Records Officer, Juno Healthcare

PO Box 2116 Fitzroy, VIC 3065

[privacy@junohealthcare.com.au](mailto:privacy@junohealthcare.com.au)

1300 414 251

# Juno Website and Platform

## Using our website, Juno Platform, and cookies

When you use our website and/or access the Juno Platform, we automatically collect certain metadata such as your device ID, device type, IP address, geo-location information (unless this is switched off in your browser or device), browser type, computer and connection information, page view and website traffic statistics, advertising and website interaction data (e.g. website visits, clicks and other interactions with website content, and the timing and frequency of that interaction) and standard web log information.

We will not attempt to associate the above data with your name or address.

Our website and the Juno Platform may also use cookies and other similar technology which track website usage unless you have disabled cookies in your browser or device settings. If you disable cookies, our website and services may not function properly. We only use cookies that are essential to website functioning and not for broader purposes (e.g. recognising you across devices or linking with other data about you). If we use cookies to collect personal information, we will comply with this Privacy Policy in using that information.

We will use the information described above for:

- general system administration and security monitoring;
- assessing the use of our website and Juno Platform (user behaviour) to improve our website, user experience, our other services, our marketing, and the Juno Platform;
- enabling you to use our website and make enquiries via the website;
- informing our advertising, marketing, research, and analysis conducted for our business purposes.

We may disclose this information to:

- Juno subcontractors, consultants, and service providers so they can carry out tasks, activities, and functions on Juno's behalf (including website or platform hosting and maintenance service providers, or subcontractors assisting us with web development activities, data analytics and marketing);
- Juno's lawyers, professional advisers, and insurers to receive advice, and to make, respond to and resolve investigations, claims and disputes;
- government, regulators, and law enforcement where required or permitted by law (e.g. for regulatory investigations and complying with court orders and warrants); and

- to anyone Juno transfers its business or assets to, to enable them to take over and carry on Juno's business.

If you choose to make an enquiry via our website, then we will request and collect your name and contact details to enable us to respond to you, along with any details of your enquiry which you choose to provide us in our communications.

## Links

Our website may contain links to websites operated by others. As those are third party websites, our privacy policy does not apply to them, and we are not responsible for the privacy practices of those third-party sites. Please review applicable third-party privacy policies before using or providing any personal information on those websites.

If you access the Juno Platform via our website, our privacy practices will be as described for [Patients](#), [Clinicians](#) and [Juno Employees](#) (depending on your reason for using the Juno Platform).