PRIVACY POLICY

CmyNP Pty Ltd

Document	Privacy Policy
Prepared by	Lawpath Legal
Entity	CmyNP Pty Ltd ACN 697376453
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This Privacy Policy explains how CmyNP Pty Ltd collects, uses, stores, and shares your personal and health information. Because we work in opioid treatment and telehealth primary care, we handle highly sensitive information. Please read this carefully. If you have any questions, contact us before your first appointment.

1. ABOUT US

(a) CmyNP Pty Ltd (ACN 697376453) trades as CmyNP. We are a nurse practitioner-led telehealth and primary care practice providing opioid substitution treatment services (OST) and general primary care to patients in New South Wales and Queensland. CmyNP is operated by Shari Edwards, an endorsed Nurse Practitioner (AHPRA Registration No. NMW0001666654).

(b) We are bound by the Privacy Act 1988 (Cth) and the 13 Australian Privacy Principles (APPs), which set out how we must handle your personal information. Health information is classified as sensitive information under the Privacy Act and receives the highest level of protection.

(c) Our Privacy Officer can be contacted at:

Email: privacy@cmynp.com.au

Phone: 0424260578

Website: www.cmynp.com.au

2. WHAT INFORMATION WE COLLECT

We collect only the personal and health information we need to provide safe clinical care and to operate our practice. This includes:

2.1 Identity and contact information

Your full name, date of birth, address, phone number, email address, and emergency contact details.

2.2 Health and clinical information

Your medical history, current medications (including prescribed and non-prescribed substances), diagnoses, clinical notes, test results, treatment plans, and any information received from other treating health practitioners involved in your care.

2.3 Opioid treatment specific information

Information about your opioid treatment program (OTP) enrolment, the OST medicines you are prescribed (methadone, buprenorphine, depot buprenorphine), your Nominated Pharmacy, supervised dosing records, takeaway authorisation status, and prescription monitoring records held in SafeScript NSW and QScript.

2.4 Government and funding information

Your Medicare number, Individual Healthcare Identifier (IHI), and any details related to block-funded services delivered under the arrangement with Social Futures and the NSW Ministry of Health.

2.5 Financial information

Invoice and payment records. For privately billed services, your billing details. We use Xero for accounting - only your name and invoice details are stored in Xero.

2.6 Identity verification

A copy or record of government-issued photo ID collected at your first consultation to verify your identity, as required for telehealth clinical services.

2.7 Communications

Records of emails, messages, and other communications between you and CmyNP.

3. How we collect your information

(a) We collect most information directly from you - during consultations, through our booking system (Halaxy), by email, or by phone. In some cases, we collect information from others with your consent, including:

- (i) other treating health practitioners (GPs, specialists, mental health providers);
- (ii) your Nominated Pharmacy;
- (iii) SafeScript NSW and QScript (prescription monitoring systems, as required by law);
- (iv) the NSW Ministry of Health and Social Futures, where you are receiving services under that arrangement;
- (v) pathology services, where we have requested tests on your behalf; and
- (vi) emergency services, in the event of a safety emergency.

(b) We collect information by lawful and fair means. If we need to collect information from a third party about you, we will tell you unless it is not practicable or we are required or permitted by law to collect it without your knowledge.

4. Why we collect and use your information

(a) The primary purpose for collecting your information is to provide you with safe, effective clinical care. This includes:

- (i) assessing your health needs and developing a treatment plan;
- (ii) prescribing and managing your opioid treatment medicines;
- (iii) coordinating your care with your Nominated Pharmacy, pathology services, and other treating practitioners;
- (iv) complying with OTP authority requirements and real-time prescription monitoring obligations under SafeScript NSW and QScript;
- (v) fulfilling our obligations under the NSW Ministry of Health contract and our arrangement with Social Futures;
- (vi) processing Medicare billing or bulk billing where applicable;
- (vii) managing appointments, reminders, and administrative communications;

(viii) maintaining clinical records as required by law; and

(ix) meeting our reporting, notification, and record-keeping obligations under applicable law.

(b) We will only use your information for a purpose that you would reasonably expect given the nature of our clinical relationship, or with your consent. We do not use your health information for direct marketing.

5. WHO WE SHARE YOUR INFORMATION WITH

We treat your health information with the utmost confidentiality. We will only share it in the circumstances described below.

5.1 SafeScript NSW and QScript

We are required by law to submit your prescription information to SafeScript NSW (for NSW patients) and QScript (for Queensland patients) before prescribing monitored medicines including your OST medicines. Your prescription history in these systems can be accessed by other authorised health practitioners involved in your care. This is a legal requirement, not a choice. For further detail, see clause 6.

5.2 **Your Nominated Pharmacy**

We share your prescription information with your Nominated Pharmacy to enable supervised dosing and dispensing of your OST medicines. This includes your dosing instructions, takeaway authorisation, and any changes to your prescribing arrangement.

5.3 NSW Ministry of Health and Social Futures

If you are receiving services under our arrangement with Social Futures (funded by the NSW Ministry of Health), we are required to share certain information with those organisations as part of our contractual obligations. This may include confirmation of service delivery, clinical progress where required, and incident reports. We will tell you what information is being shared and why when you enter that arrangement.

5.4 Your treating healthcare team

With your consent, we may share relevant clinical information with other health practitioners involved in your care - for example, your GP, a mental health practitioner, or a specialist. We will tell you who we plan to share with and obtain your agreement. You can ask us not to share with a particular person and we will respect that request unless we are required by law to share.

5.5 Medicare

For Medicare-billed services, we share the minimum required service information with Medicare to process claims. This is required to access Medicare rebates.

5.6 **Pathology services**

Where we request pathology tests on your behalf, we share the necessary clinical information with the pathology provider and receive results back.

5.7 **Required by law**

(a) We may be required to disclose your information without your consent in limited circumstances, including:

(i) if required by court order, subpoena, or other legal process;

(ii) if required under mandatory reporting obligations (for example, under child protection legislation);

(iii) if disclosure is necessary to prevent a serious and imminent threat to your life or safety or the life or safety of another person; or

(iv) if required under the Notifiable Data Breaches scheme to notify the OAIC of a data breach.

(b) We will disclose only the minimum necessary information in these circumstances and will inform you where we are permitted to do so.

5.8 What we will never do

We will never sell, rent, or trade your personal information. We do not share your information with commercial companies for marketing purposes. We do not share your information with employers, insurers, or legal representatives without your explicit written consent, except where required by law.

6. Real-time prescription monitoring - SafeScript NSW and QScript

(a) This clause is particularly important for patients receiving opioid treatment. Please read it carefully.

(b) Australia's state and territory governments operate real-time prescription monitoring (RTPM) systems that record information about certain medicines prescribed and dispensed to you. As a nurse practitioner prescribing controlled medicines across NSW and QLD, we are legally required to use both systems.

(c) SafeScript NSW records Schedule 8 medicines prescribed and dispensed to you in New South Wales, including your OTP medicines. It is also the system through which we apply for and manage your OTP prescribing authority and dosing point arrangements.

(d) QScript records monitored medicines prescribed and dispensed to you in Queensland, including opioids and benzodiazepines.

(e) Your prescription records in both systems can be seen by any authorised health practitioner or pharmacist who is treating you in that state - for example, hospital emergency departments, GPs, and other prescribers. This is a legal requirement designed to protect your safety.

(f) If RTPM information indicates a safety concern - such as prescriptions from multiple sources, a dangerous combination of medicines, or potential diversion - we may be required to alter or cease your prescribing, contact other treating practitioners or pharmacies, and/or notify a regulatory authority.

(g) By receiving OST services from CmyNP, you acknowledge that your prescribing information will be shared through SafeScript NSW and QScript as required by law. This sharing is a condition of receiving opioid treatment medicines and cannot be opted out of.

7. Third-party systems we use

We use the following third-party systems to operate our practice. Your information may be stored or processed in these systems. We have chosen each provider carefully based on their security and privacy standards.

System	Purpose	Data location	Privacy policy
Halaxy	Clinical records, appointments, patient notes, billing, telehealth bookings	Australia (cloud)	halaxy.com/privacy
Google Workspace	Email and clinical communications. HIPAA-compliant settings enabled.	Australia (Google AU data centre)	policies.google.com/privacy
Xero	Accounting and invoicing. Invoice details, patient/guarantor name only.	USA (cloud)	xero.com/au/legal/privacy
SafeScript NSW	Mandatory real-time prescription monitoring and OTP authority. NSW Health operated.	Australia(NSW Government)	health.nsw.gov.au
QScript	Mandatory real-time prescription monitoring for monitored medicines in QLD. Queensland Health operated.	Australia (QLD Government)	health.qld.gov.au

7.1 Overseas data storage

(a) Xero stores financial data on servers in the United States. Only your name and invoice details are held in Xero - no clinical information is stored there. We limit the information we put into Xero to the minimum needed for accounting purposes.

(b) Google Workspace email is operated through Google's Australian data centre with HIPAA-compliant security settings. Where email communications contain clinical information, we take reasonable steps to ensure they are addressed correctly and handled securely.

(c) All other clinical information is stored in Halaxy on Australian servers. By engaging our services, you acknowledge that limited financial data may be held overseas in Xero as described above. If you have concerns about this, please contact us.

8. How we protect your information

(a) We take reasonable and rigorous steps to protect your personal and health information from misuse, loss, unauthorised access, and disclosure. Our security measures include:

(i) storing all clinical records in Halaxy, a secure Australian-based platform with restricted staff access and login authentication;

(ii) using Google Workspace with HIPAA-compliant security settings for email communications;

(iii) restricting access to patient records to authorised clinical and administrative staff on a need-to-know basis;

(iv) using strong passwords and, where available, multi-factor authentication for all systems;

(v) ensuring that any devices used for clinical work are password-protected and encrypted; and

(vi) being aware that Halaxy does not automatically purge records at the end of a retention period - we will manage data deletion manually and will contact Halaxy for support with bulk deletion processes as required.

(b) Despite our best efforts, no system is completely secure. If we become aware of a data breach that is likely to result in serious harm to you, we will notify you and the Office of the Australian Information Commissioner (OAIC) as required under the Notifiable Data Breaches scheme.

9. How long we keep your information

(a) We keep your health records for the following minimum periods, as required by law and professional standards:

(i) Adult patients: 7 years from the date of your last consultation with CmyNP.

(ii) Child patients: until the patient turns 25 years old, or 7 years from the date of last consultation, whichever is longer.

(iii) Prescription records: we will confirm the applicable retention period for prescription and OST-specific records and update this policy accordingly.

(b) After the retention period has passed and we are not required by law to keep your records, we will securely delete or permanently de-identify them. Because Halaxy does not automatically delete records, we manage this process manually. If you would like to know when your records are due for deletion, or if you would like to request deletion earlier (subject to our legal obligations), please contact us.

(c) We do not keep your information indefinitely. We maintain a record of any consents, withdrawals of consent, and privacy preferences you have given us.

10. Your rights

Under the Privacy Act, you have the following rights in relation to your personal and health information.

10.1 Access

You have the right to access the personal information we hold about you. We will respond to access requests within 30 days. We may need to verify your identity before releasing information. There is generally no fee for access requests, though we may charge a small cost-recovery fee for very large requests and will tell you in advance if this applies.

10.2 Correction

If you believe any information we hold about you is incorrect, incomplete, or out of date, you can ask us to correct it. We will make corrections promptly. If we disagree that the information needs to be corrected, we will explain why and, at your request, add a note to your record that you contest its accuracy.

10.3 Withdrawal of consent

You can withdraw your consent for us to use or hold your information at any time. Please be aware that withdrawing consent for core clinical purposes - such as consent to RTPM sharing - may mean we cannot safely continue your OST prescribing. We will explain the implications before you withdraw consent.

10.4 Complaints

If you are unhappy with how we have handled your information, you can make a complaint to us directly (see clause 12). If you are not satisfied with our response, you can lodge a complaint with the OAIC (see clause 12).

11. Consent

(a) Because we handle sensitive health information - including information about opioid dependence and treatment - your consent is important to us. We collect your consent through our Patient Intake and Consent Form, which you sign before or at your first appointment.

(b) By signing the Consent Form, you consent to:

(i) CmyNP collecting, holding, using, and disclosing your health information as described in this Privacy Policy;

(ii) your prescription information being recorded in SafeScript NSW and QScript and accessed by other authorised health practitioners;

(iii) your information being shared with your Nominated Pharmacy for supervised dosing and dispensing purposes;

(iv) your information being shared with Social Futures and the NSW Ministry of Health where you are receiving services under that arrangement;

(v) limited financial data being stored in Xero on servers in the United States; and

(vi) CmyNP contacting emergency services at your last known location if we are concerned for your immediate safety during a consultation.

(c) You can withdraw your consent at any time by contacting us in writing. Withdrawal of consent for certain core clinical purposes may affect our ability to provide services to you. We will always explain the implications before any consent is changed.

(d) We do not bundle unnecessary consents together. Consenting to clinical information handling is separate from any choice about receiving communications from us.

12. Complaints

(a) If you have a concern or complaint about how we have handled your personal information, please contact us first and we will do our best to resolve it.

Privacy Officer – CmyNP

Email: privacy@cmynp.com.au

Phone: 0424260578

(b) We will acknowledge your complaint within 5 business days and respond within 30 days. If we cannot resolve it within that time, we will keep you informed of progress.

(c) If you are not satisfied with our response, you can lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

Website: www.oaic.gov.au

Phone: 1300 363 992

Post: GPO Box 5218, Sydney NSW 2001

(d) You may also contact the relevant state health regulator - the NSW Health Care Complaints Commission (www.hccc.nsw.gov.au) or the Queensland Health Ombudsman (www.oho.qld.gov.au) - depending on where the complaint arose.

13. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our services, the law, or the systems we use. The current version will always be available on our website at www.cmynp.com.au. If we make a material change, we will notify you by email or at your next appointment.

This policy was last updated: 8/8/2026