# Privacy Policy

## MGS Physiotherapy

**Effective date:** 4th November 2026

### 1. About this policy

MGS Physiotherapy respects the privacy of our patients and is committed to protecting personal and health information.

This Privacy Policy explains how we collect, hold, use, disclose and protect personal information, including sensitive health information, in the course of providing physiotherapy and related healthcare services.

This policy applies to MGS Physiotherapy at our Manly and North Curl Curl clinics, operated by **MGS Manly Pty Ltd as trustee for The MGS Unit Trust** (referred to in this policy as "MGS", "we", "us" or "our").

We handle personal and health information in accordance with applicable privacy laws, including the *Privacy Act 1988* (Cth), the Australian Privacy Principles where applicable, and the *Health Records and Information Privacy Act 2002* (NSW).

### 2. What information we collect

The information we collect depends on the services we provide and your interactions with us. It may include:

**Personal and contact information**

- Name, date of birth, address, telephone number and email address.
- Emergency contact details and information about a parent, guardian or other authorised representative, where relevant.
- Information needed to identify you and manage your appointments.

**Health and clinical information**

- Medical history, current symptoms, diagnoses, injuries, previous treatment and relevant health conditions.
- Assessment findings, clinical observations, treatment plans, progress notes and outcomes.
- Exercise programs, functional assessments, patient-reported outcomes and rehabilitation progress.
- Information about medications, allergies, relevant risks and other matters affecting your care.
- Referrals, medical reports, correspondence and information received from other healthcare providers.

**Administrative and payment information**

- Appointment history, attendance and communications with our practice.
- Medicare, private health insurance, workers compensation, CTP, DVA or other funding and claim details, where relevant.
- Medicare details, only where necessary for specific services or funding arrangements, such as Enhanced Primary Care (EPC) plans or other eligible Medicare-funded services. We do not routinely collect or retain Medicare numbers for private patients.
- Payment and transaction information required to process fees or administer claims.
- MGS Physiotherapy does not routinely retain or store patients' credit or debit card details or bank account details for ordinary payment processing. Where necessary to administer an insurance or funded treatment claim, we may collect or hold relevant financial or banking information, including in connection with workers compensation, CTP or DVA claims.

**Electronic and technical information**

When you interact with our website or electronic services, we may collect limited technical information, such as information about your device or website usage, where applicable. This may occur through cookies, analytics tools and similar technologies, where these are used. This information helps us operate, maintain and improve our website and understand how visitors use our online services.

## 3. How we collect information

We generally collect information directly from you when you:

- Book an appointment or register as a patient or complete an intake or medical history form.
- Attend a consultation, assessment or treatment session.
- Speak with our practitioners or administrative staff.
- Contact us by telephone, email, website or other communication channels.
- Make a payment or provide information required for a funding or insurance claim.

We may also collect relevant information from other sources, including your referring doctor, other healthcare providers, insurers, employers, rehabilitation providers or funding bodies, where appropriate and permitted by law.

Where information is collected from another source, we take reasonable steps to ensure you are informed about the collection where required by law.

## 4. Why we collect and use information

We collect, store, use and disclose personal and health information for purposes reasonably connected with providing and managing physiotherapy care, including to:

- Assess your health needs and provide appropriate physiotherapy treatment.
- Maintain accurate clinical records and monitor your progress.
- Prepare treatment plans, exercise programs, reports, referrals and correspondence.
- Manage appointments, reminders, follow-up communications and related administration.
- Process payments, rebates, Medicare, insurance claims and other funding claims arrangements.

- Communicate with your referring practitioner and other relevant healthcare providers in your care.
- Meet legal, professional, regulatory, insurance and record-keeping obligations.
- Protect the safety of patients, staff and other individuals where legally permitted or required.

We do not use or disclose your health information for unrelated purposes unless you have consented or the use or disclosure is otherwise permitted or required by law.

## 5. Practice systems and service providers

We use third-party software providers to support the delivery and administration of our services. These providers may process personal and health information on our behalf to deliver their services.

Our principal systems include the following.

**PracSuite**

We use PracSuite as our practice management software system. It supports functions such as patient administration, appointments, clinical record keeping and clinical correspondence.

Patient information entered into or managed through PracSuite is handled in accordance with our legal obligations and the relevant service arrangements.

Patient information recorded in PracSuite is accessible only to authorised personnel in accordance with their access permissions.

**PracSuite AI**

We use AI-assisted functionality within PracSuite to support clinical documentation, including transcription, preparation of clinical notes and drafting of letters.

Depending on the feature used, this may involve processing consultation audio, practitioner dictation, transcripts, existing clinical information or draft documents.

AI-generated content is intended to assist our practitioners. The treating practitioner remains responsible for reviewing and finalising clinical documentation and exercising independent professional judgement.

PracSuite's published information describes the use of third-party AI providers for some processing and states that recording and transcript handling depend on the relevant functionality. We do not assume that all AI processing is performed solely by MGS.

Where consultation audio recording is used, we will obtain the required consent before recording begins. You may raise concerns about AI-assisted documentation or ask about alternative documentation arrangements before your consultation.

We will not proceed with a recording where required consent has not been obtained. Choosing not to have a consultation recorded will not, by itself, prevent you from receiving physiotherapy care, although we may need to use an alternative method of clinical documentation.

We will handle audio, transcripts and AI-generated documents in accordance with applicable law, our consent arrangements and the relevant system settings.

**Physitrack**

We use Physitrack to create, prescribe and deliver individualised exercise and rehabilitation programs.

Information relevant to your exercise prescription, rehabilitation and progress may be processed through Physitrack. Our Physitrack service integrates with PracSuite to support our clinical workflow.

We use this information to support your treatment and exercise program, monitor progress where applicable and communicate relevant instructions.

In our usual workflow, the information entered includes the patient's name, year of birth, email address and a program-specific code, together with the assigned exercise program and relevant technical or usage information.

Physitrack does not have access to any other patient identifiers or clinical history other than described above. Physitrack's privacy arrangements may permit information to be processed or transferred overseas. Further information is available in the provider's Privacy Policy.

**HealthLink**

We use HealthLink to send and receive secure electronic messages with participating healthcare providers and referral networks where the service is accepted and available. These messages may contain clinical information relevant to patient care, along with information needed to deliver and track the messages.

Some HealthLink systems or service providers may operate outside Australia. Further information is available in the provider's Privacy Policy.

**Other service providers**

We may use other service providers where reasonably necessary to operate our practice, such as information technology, communications, payment processing, data storage and professional administration.

We take reasonable steps to ensure that information handled by these providers is appropriately protected and used for authorised purposes.

## 6. Electronic communications and appointment reminders

We may use your contact details to communicate with you about appointments, treatment, exercise programs, follow-up care and related administrative matters by SMS, email or telephone.

Patients can record their communication preferences during registration. These preferences are recorded in our practice management system and can be updated by patients or staff when requested.

## 7. AI-assisted clinical documentation

Some practitioners may choose to use the optional AI-assisted documentation features available through PracSuite. These features may assist with preparing clinical notes, letters and other documents using

practitioner dictation or, where applicable, audio recorded during a consultation.

The practitioner remains responsible for reviewing and finalising clinical documentation.

Where audio recording is used, we seek the patient's explicit consent before recording. Choosing not to participate in audio recording should be discussed with the practitioner so that alternative documentation arrangements can be made where appropriate.

Further information about how the AI features operate, including audio recording, transcription, storage and consent, is provided in our separate **PracSuite AI — Patient Information and Consent Notice.**

## 8. When we disclose information

We disclose personal and health information only where reasonably necessary for the purposes described in this policy, where you have consented, or where disclosure is otherwise permitted or required by law.

This may include disclosure to:

- Your referring doctor, treating practitioners and other healthcare providers involved in your care.
- Medicare, private health insurers, workers compensation insurers, CTP insurers, DVA or other relevant funding bodies.
- Employers, rehabilitation providers or other parties involved in coordinating or funding treatment, where authorised or otherwise permitted by law.
- Our practice management, exercise-prescription, secure messaging and other service providers, as described in this policy.
- Our professional advisers, regulators, courts or government authorities where required or permitted by law.

We may disclose relevant information to prevent or lessen a serious threat to an individual's life, health or safety where permitted by law.

We limit disclosures to information relevant to the purpose for which it is provided. Where consent is required, we will seek it before making the disclosure.

We do not sell patient clinical information.

## 9. Overseas handling of information

MGS Physiotherapy uses service providers with different data-handling arrangements. Some providers may permit information to be processed, stored or accessed outside Australia.

For example, PracSuite has advised that its data is stored in Australia and that its AI documentation service uses Australian cloud infrastructure and Australian API endpoints. Physitrack and HealthLink have privacy arrangements that may allow certain information to be handled overseas.

We take reasonable steps to understand the relevant arrangements and protect information handled by service providers, in accordance with our legal obligations.

## 10. How we protect information

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

Measures may include access controls, system permissions, authentication requirements, encryption and the use of service providers with appropriate security arrangements.

Access to clinical records is restricted to authorised personnel who need the information to perform their roles.

No method of electronic storage or transmission can be guaranteed to be completely secure, but we take reasonable steps to protect the information we hold.

## 11. How long we retain information

MGS Physiotherapy retains health information for at least the minimum periods required by applicable law.

Under NSW health privacy legislation:

- **Adult patients:** health information collected when a patient is 18 or older must generally be retained for at least seven years from the last occasion on which a health service was provided.
- **Children and young people:** health information collected while a patient is under 18 must generally be retained until the patient reaches 25 years of age.

Records may need to be retained for longer where required by law or where necessary to address an ongoing complaint, claim, investigation or other legal obligation.

When health information is no longer required and may lawfully be disposed of, we take reasonable steps to securely destroy or de-identify it. Where required by law, we also retain a record of its disposal.

## 12. Accessing and correcting your information

You may request access to personal or health information we hold about you or ask us to correct information that you believe is inaccurate, incomplete, out of date or misleading.

Requests can be made using the contact details below. We may need to verify your identity before responding.

We will respond within a reasonable period and in accordance with applicable law. In some circumstances, access may be limited or refused where permitted by law. If we cannot make a requested correction, we will explain the reasons where required.

## 13. Children and authorised representatives

Where a patient is a child or requires assistance managing their healthcare information, we consider the patient's capacity, applicable law and the authority of any parent, guardian or representative before providing access or disclosing information.

We take reasonable steps to ensure information is provided only to people who are authorised to receive it.

## 14. Website and electronic communications

If you contact us electronically or use our website, we may collect information you choose to provide and limited technical information needed to operate and secure the service.

Electronic communications can carry privacy risks. If you have concerns about communicating sensitive health information by email or another electronic channel, please contact us to discuss an appropriate alternative.

## 15. Privacy concerns and complaints

If you have a complaint regarding our handling of your personal information or concerning our privacy practices, please contact us first using the contact details set out at the bottom of this Privacy Policy, so that we can investigate and respond.

We may need to contact you to request further details of your complaint. In the unlikely circumstances we are unable to resolve your complaint to your satisfaction, you may have the right to lodge a complaint with the relevant data protection authority with the relevant privacy regulator. For reference, we set out below the identify of some of the relevant authorities:

- The NSW Information and Privacy Commission, for matters within its jurisdiction. (IPC) https://www.ipc.nsw.gov.au/
- The Office of the Australian Information Commissioner, for matters within its jurisdiction. (OAIC): https://www.oaic.gov.au/.

## 16. Contact us

For privacy enquiries, access requests, corrections or complaints, contact:

**MGS Physiotherapy**

Privacy contact: Jenny Rollins
Email: admin@mgs.physio
Telephone: (02) 9976 2666
Postal address: 1 Whistler Street, Manly NSW 2095

## 17. Changes to this policy

We may update this policy from time to time to reflect changes in our practices, systems or legal obligations. The current version will be made available through our usual patient information channels.

**Last updated:** 4th November 2026

## 18. Third-party service providers and privacy policies

The following providers support the delivery and administration of our services. Their privacy policies provide further information about how they handle information within their respective services.

| Service Provider | Purpose | Provider privacy policy |
|---|---|---|
| PracSuite | Practice management and clinical records | PracSuite Privacy Policy |
| Physitrack | Prescribed exercise programs | Phyistrack Privacy Policy |
| HealthLink | Secure electronic messaging | HealthLink Privacy Policy |