

# privacy policy

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## Who we are

We are Adora Fertility Pty Ltd (ACN 616 422 818), the fertility division of Adora BidCo Pty Ltd (657 710 560). We manage fertility treatment centres in Australia. We manage our centres on behalf of the medical practitioners who operate from them.

Adora Fertility Pty Ltd is bound by the Australian Privacy Principles under the Privacy Act 1988 and other relevant laws about how private health service providers handle personal information (including but not limited to patient health information).

Adora Fertility clinics are committed to complying with all applicable privacy laws which govern how Adora Fertility clinics collect, use, disclose and store your personal information. You can read more about these laws on the [Office of the Australian Information Commissioner's website](#).

## What personal information do we collect and hold?

Personal information is information or an opinion about an identified person, or someone who is reasonably identifiable, whether or not the information or opinion is true and whether the information or opinion is recorded in a material form or not.

The types of personal information we may collect and hold about you include:

- Full Name
- Address
- Date of Birth
- Gender
- Marital Status
- Cultural background
- Email address
- Medicare/Concession Card Information
- Private health fund membership information
- Financial transaction details associated with services we have provided to you
- Clinical notes
- Test results
- Treatment plan
- Telephone number
- Medical history
- Healthcare identifiers
- Next of kin
- Prescribed medications
- Referral details
- Disease status

## How do we collect and hold personal information?

We collect personal information about you in several ways, including from:

- Information collected by an employee of Adora Fertility, such as a receptionist or nurse;
- Information collected by independent health service providers in Adora Fertility and recorded on patient records;
- Information from external health providers which is provided to Adora Fertility and placed on the record of the patient;

- Information collected through websites in the form of online enquiries or requests for appointments;
- Someone who has responsibility for you (your parent, carer or guardian); and you directly.

## Cookies, pixels and tags

Our websites use cookies, pixels, tags and similar technologies. These are small pieces of text stored in your browser or small images embedded in webpages that support the following tasks:

**Basic functions:** To help our websites work (for example, remembering which page you are on, or enabling functions like audio or video). We do not collect any personal information in this process.

**Analytics:** We use cookies to anonymously log user activity, helping us understand website usage trends and improve security. We primarily use **Google Analytics** for this purpose. You can opt out by visiting the [Google Analytics opt-out page](#).

**Advertising:** We work with third-party advertising partners to deliver relevant ads on social media and other websites. Cookies, pixels, and tags help us understand your interests. When you take certain actions (e.g., submitting a form), we may share limited data with our advertising partners to assess campaign effectiveness. This data does not directly identify you but may include device and browser information. Our advertising partners include **Meta, Google, Pinterest, and other digital ad platforms**. You can manage your ad preferences via:

- [Meta's Ad Preferences](#)
- [Google Ad Settings](#)
- [Pinterest Personalisation Settings](#)

## Why do we need your personal information and what do we do with it?

### 1. Patient care

We collect, maintain, use and disclose personal information about you in order to assist the medical practitioners using our facilities to provide you with appropriate care, treatment and services.

Your personal information is used by us and those medical practitioners:

- to provide you with medical care and services;
- to provide you and/or your doctor with information that may assist you in managing and improving your health; and
- as a medical history for you that allows the medical practitioners using our facilities to provide you with better care as it assists with identifying changes to your health over time.

### 2. Operating our business

We use your personal information as necessary to manage our administration, including storage of data, and management of accounts and payment for the services provided to you. Specifically, we will use and, where necessary, disclose your personal information to:

- obtain payment from, as appropriate, Medicare Australia, you, your private health insurance fund or from any organisation responsible for payment of any part of your account, such as the Department of Veterans Affairs;

- if the circumstances require, we may disclose your personal information to our insurers or those of the medical practitioners using our facilities;
- manage and store your personal information in a secure fashion, including management and storage by third parties such as cloud service providers with contractual relationships with Adora Fertility or associated entities; and
- entities within the Adora BidCo group disclose medical records and other personal information with each other for administrative and information management purposes. This includes the disclosure of personal information for storage and archiving purposes. Any such disclosures are subject to strict conditions relating to confidentiality and data security.
- We may use your personal information to communicate with you, including to:
  - give you important information (including by SMS or email) about the products and services offered by our practices;
  - respond to your online enquiries or process requests for appointments;
  - advertise to you particular products and services that may be of interest to you; and
  - contact you to make and confirm appointments, discuss pre-operative matters and any other matters relating to your procedure.

### **3. Teaching and Research**

We may use your personal information for internal teaching purposes or to monitor, evaluate, plan and improve the services provided at our practices. We will only use de-identified information (information that does not contain any personal details that may reasonably identify you) for these purposes.

We may use your personal information to provide third parties (such as universities, government organisations and pharmaceutical companies) with de-identified health information. Before any health information is provided to a third party it is de-identified, that is, the name and address of the patient and any other information that could otherwise allow an individual to be identified, is removed from the health information. That de-identified information is then aggregated with the de-identified health information in respect of other patients. The third party uses the bulk de-identified information it receives for the business purposes of the third party.

### **4. Mandatory clinical pregnancy and birth outcome reporting**

Adora Fertility is subject to a legal obligation to send a summary of each ART treatment cycle to the University of New South Wales, Sydney, for inclusion in the Australian and New Zealand Assisted Reproduction Database (ANZARD), Victorian Health Regulator (VIC patients only), NSW Wales Central Donor Register (NSW patients only), Reproductive Technology Council / The Licensing and Accreditation Regulatory Unit (WA patients only) and QLD Assisted Reproductive Technology Unit and Donor Conception Information Register (QLD Patients only). The ANZARD is stored on location at the University. This data will be used for national statistical reporting, regulatory review and population-based research.

### **5. Other disclosures**

We may be required by law to disclose your personal information without your consent.

## **Storage of your personal information**

We take reasonable steps, and implement reasonable safeguards, to ensure the protection of the personal information that we hold. All patient information is handled securely and in accordance with professional duties of confidentiality.

Adora Fertility clinics are subject to a range of rules relating to the periods for which health information and records must be retained. We must generally retain health information about an individual:

- for 7 years from the last occasion on which we provided a health service to the individual – if we collected the information when the individual was 18 years old or older; or
- until the individual turns 25 – if we collected the information when the individual was less than 18 years old.
- ART treatment specific requirements (as per State ART legislation):
  - NSW: 50 years. Gamete provider details, consents, uses of gametes, use of embryos including transport, periods of storage, offspring.
  - WA: Records kept indefinitely. All records related to keeping and use of gametes & embryos in sufficient detail to prove compliance with reporting requirements.
  - QLD: Under QLD ART Act, destruction of records is prohibited.
  - VIC: 75 years after last attendance or access by a patient, or if no child born, 15 years.

## **What happens if we do not collect your personal information?**

If you do not wish for us to collect certain information, you are required to inform us so that we can discuss any consequences this may have for your health care. If you do not provide us with certain personal information, this may impact on our ability to provide you with quality care.

## **Do we transfer personal information overseas?**

We may disclose your personal information to wholly owned subsidiaries of our parent company, Adora BidCo Pty Ltd, or to third parties, which are based in India, Malaysia and the Philippines. These companies provide billing, payment and other administrative services, data-entry and data analytics services to us. We take reasonable steps to ensure that these companies do not breach the requirements of the *Privacy Act 1988* (Cth) and other State and Territory legislation that may be applicable.

## **Can you access your personal information we hold?**

You may request access to the personal information we hold about you. You can also request that corrections be made to it. We will respond to your request within a reasonable time. There may be some circumstances where we are not required to give you access to or correct your personal information. We will normally give you a written notice setting out our reasons for not complying

with your request and informing you of how you can complain about our refusal. There is no fee for requesting access to your personal information or for us to make corrections. However, we will charge a fee for our costs involved in collating and providing you with access to any personal information. That fee is payable before access is given.

## **What to do if you would like to make a complaint about a breach of the Australian Privacy Principles**

If you have any concerns about how we handle your personal information or you wish to make a complaint on the basis that we have breached the Australian Privacy Principles prescribed by the *Privacy Act 1988* (Cth), please contact us. If you would like to make a complaint, you will need to send us a written complaint (see details below). We will endeavour to respond to your complaint within a reasonable time after it is made.

### **How to contact us**

[Adora Fertility Sydney](#)

[Adora Fertility Brisbane](#)

[Adora Fertility Melbourne](#)

[Adora Fertility Perth](#)

Further information

If you would like more information about privacy in general, please refer to the [Office of the Australian Information Commissioner's website](#)

*Privacy Policy Last Updated: 26/05/2025*

*We may change this privacy policy from time to time. A current version of our privacy policy will be available at our centres and will commence from the date it is made available.*