



**Australian  
Privacy  
Foundation**

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May 19 2009

Karen Curtis  
Australian Privacy Commissioner  
GPO Box 5218 Sydney NSW 2001

Dear Commissioner Curtis

**Re: Medical Director and AsteRx data**

The Australian Privacy Foundation (APF) understands from a recent report in the Australian that AsteRx has adopted a marketing strategy whereby it offers business software to General Practitioners (GPs) in exchange for access to patients' de-identified prescription data (1). Evidently the data is harvested from several hundred GPs' computers, aggregated and then sold to pharmaceutical clients.

We note that that a complaint made to your office in 2004 about extracting data directly from Medical Director software was subsequently dismissed on the basis that the patient data was de-identified.

However the APF remains concerned about the de-identification process.

In order to ensure that the public is properly informed about the current controversy, the APF requests that your office provides descriptions of:

- the analysis that was undertaken
- the nature of the evidence that was provided
- the data-items that are acquired by AsteRx (so that the public can be assured that re-identification is infeasible), and
- the regulatory arrangements that ensure that the company cannot make material changes to the arrangements.

Thank you for your consideration of this matter.

Yours sincerely

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cc: Karen Dearne

1. Dearne, K. "Grab for patient records" in the Australian IT. Cited May 19, 2009.  
<http://www.australianit.news.com.au/story/0,24897,25502296-24169,00.html>