

Current as of: 19 October 2018

Introduction

This privacy policy is to provide information to you, our client, on how your personal information (which includes your health information) is collected and used within our practice, and the circumstances in which we may share it with third parties.

Why and when your consent is necessary

When you register as a client of our practice, you provide consent for our Allied Health Professionals and staff to access and use your personal information, so they can provide you with the best possible healthcare. Only staff who need to see your personal information will have access to it. If we need to use your information for anything else, we will seek additional consent from you to do this.

Why do we collect, use, hold and share your personal information?

Our practice will need to collect your personal information to provide healthcare services to you. Our main purpose for collecting, using, holding and sharing your personal information is to manage your health. We also use it for directly related business activities, such as financial claims and payments, practice audits and accreditation, and business processes (e.g. staff training).

What personal information do we collect?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- healthcare identifiers
- health fund details.

Dealing with us anonymously

You have the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorised by law to only deal with identified individuals.

How do we collect your personal information?

Our practice may collect your personal information in several different ways.

1. when you make your first appointment our practice staff will collect your personal and demographic information via your registration.
2. while providing health services, we may collect further personal information.
3. we may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media.
4. in some circumstances personal information may also be collected from other sources. Often this is because it is not practical or reasonable to collect it from you directly. This may include information from:
 - your guardian or responsible person
 - other involved healthcare providers, such as General Practitioners, specialists, hospitals, community health services and pathology and diagnostic imaging services
 - your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

When, why and with whom do we share your personal information?

We sometimes share your personal information:

- with third parties who work with our practice for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with APPs and this policy
- with other healthcare providers
- when it is required or authorised by law (e.g. court subpoenas)
- when it is necessary to lessen or prevent a serious threat to a client's life, health or safety or public health or safety, or it is impractical to obtain the patient's consent
- to assist in locating a missing person
- to establish, exercise or defend an equitable claim
- for the purpose of confidential dispute resolution process
- when there is a statutory requirement to share certain personal information

Only people who need to access your information will be able to do so. Other than while providing health services or as otherwise described in this policy, our practice will not share personal information with any third party without your consent.

Our practice will not use your personal information for marketing any of our goods or services directly to you without your express consent. If you do consent, you may opt out of direct marketing at any time by notifying our practice in writing.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms. Personal information is exclusively stored electronically. We do not keep any paper-based records. The majority of personal information is stored and backed-up on cloud-based document storage hosted on Australian servers in accordance with the APPs.

Our forms are generated using an online software system. Information collected is stored on an Australian server and complies with the APPs.

We use Calendly online booking software which is hosted on overseas servers. By using our online booking system, you consent to the processing of information and data about you by Calendly.

Our practice stores all personal information securely. We password protect computers, tablets and smartphones. Access to personal information is only given to staff and contractors (such as our IT service provider) who require it to complete their job. Staff and contractors are required to sign a confidentiality agreement to protect the data they have access to.

We use up-to-date virus protection software on our computers and regularly conduct software updates on our devices and website to help guard against cyber-attacks.

We store and dispose of personal information held within records in accordance with the Archives Act 1983 and relevant records authorities.

How can you access and correct your personal information at our practice?

You have the right to request access to, and correction of, your personal information. We require you to put this request in writing. We will provide access to the requested information within 30 days of receiving your written request. Access will be provided in the presence of the Counsellor, and copies of the information cannot be made. A fee equivalent to the hourly session rate will be charged for the time spent accessing and correcting this information.

Our practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. From time to time, we will ask you to verify that your personal information held by our practice is

correct and current. You may also request that we correct or update your information, and you should make such requests by notifying the Counsellor.

How can you lodge a privacy-related complaint, and how will the complaint be handled at our practice?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing via the below contact details. We will then attempt to resolve it in accordance with our resolution procedure.

Attn: Kim King
kim@seasonsfamilycounselling.com.au

We will respond to the complaint within 30 days of receiving the complaint in writing. You may also contact the OAIC. For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992.

Privacy and our website

How we protect your personal information

Our website is hosted on an Australian based server to comply with Australian data storage standards. The security of your personal information is important to us, but no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

Cookies

To improve your experience on our site, we may use 'cookies'. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our website.

Links to other websites

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other sites, and these websites are not subject to our privacy policy. We are not responsible for the content of these websites or the privacy practices of these sites. If you navigate to other websites via our website, we advise you to read their privacy policy.

Service Providers

We may employ third party companies and individuals to facilitate our website service, to provide a website service on our behalf, or to assist us in analysing how our website is used.

These third parties have access to your personal information shared via the website, only to perform these tasks on our behalf, and are obligated not to disclose or use it for any other purpose.

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the [opt-out service provided by Google](#).

Our website also uses interfaces with social media sites such as Facebook, LinkedIn and others. If you choose to "like" or

"share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this website with other Personal Information.

Embedded Content

This website may include embedded content (e.g. videos, images, articles, etc.). Embedded content belongs to the website it links to and thus their website may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content.

Post Comments

When visitors leave comments on the website, we collect the data shown in the comments form, as well as the visitor's IP address and browser user agent string to help with spam detection.

Policy review statement

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our website. You are advised to review this Privacy Policy periodically for any changes.