

PRIVACY POLICY

Connect The Dots Psychology Pty Ltd., trading as Connect The Dots Psychology, ABN 74646450142 and its related entities recognise that the right to privacy of all persons is very important. This Privacy Policy sets out the key elements of how we comply with the Australian Privacy Principles, particularly in terms of the treatment of personal information that we collect and/or hold. Connect The Dots Psychology must comply with the Australian Privacy Act, and the Australian Privacy Principles, as amended from time to time.

INTRODUCTION

Our practice is committed to best practice in relation to the management of information we collect. This practice has developed a policy to protect patient privacy in compliance with the Privacy Act 1988 (Cth) ('the Privacy Act'). Our policy is to inform you of:

- the kinds of information that we collect and hold, which, as a psychology practice, is likely to be 'mental health information' for the purposes of the Privacy Act;
- how we collect and hold personal information;
- the purposes for which we collect, hold, use and disclose personal information;
- how you may access your personal information and seek the correction of that information;
- how you may complain about a breach of the Australian Privacy Principles and how we will deal with such a complaint;
- whether we are likely to disclose personal information to overseas recipients;

LEGISLATION

- Privacy Act 1988 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012
- Notifiable Data Breaches (NDB) Scheme

- Freedom of Information Act 1982 (FOI Act)

ACKNOWLEDGEMENT OF OUR PRIVACY POLICY

Our obligations under the Privacy Amendment (Enhancing Privacy Protection) Act 2012 is to comply with the Australian Privacy Principle 1.4 which requires us to set out our policies on the management of personal information in a clearly expressed document which is free of charge to anyone who asks for it.

We respect your personal information and your right to privacy. This Privacy Policy describes the information that may be collected by us and how we protect your personal information.

Should there be, in any specific case, any inconsistency between this statement and the Act, this statement shall be interpreted, in respect of that case, to give effect to, and comply with the legislation.

EXCEPTION IN RELATION TO EMPLOYEE RECORDS

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to Connect The Dots Psychology's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Connect The Dots Psychology and employee.

CHILDREN AND MINORS

All reasonable steps will be taken that personal information will not be collected by any person who is known by the organisation to be under the age of fifteen (15) without the consent of a parent or legal guardian.

Persons under age fifteen (15) may only provide personal information with the involvement and consent of a parent or legal guardian.

VULNERABLE COMMUNITY SEGMENTS

All reasonable steps will be taken to ensure sensitive personal information will not be collected from known vulnerable community segments without their express consent, or if they are unable to give consent, consent is obtained from a legal guardian.

THE KIND OF PERSONAL INFORMATION WE COLLECT AND HOLD

Generally speaking, the Personal Information we collect is used by us to operate Connect The Dots Psychology. The Personal Information we collect about you is mostly used for performing our professional services, billing, identification, authentication, and for contacting you if we need to.

Where reasonable and relevant, we collect any special categories of personal data about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health, and genetic and biometric data.

The type of information we may collect and hold includes:

- Your name, address, gender, date of birth, telephone number, email, contact details, and credit card details;
- Medicare number, DVA number and other government identifiers, although we will not use these for the purposes of identifying you in our practice
- Other information about you, including:
 - notes of your symptoms or diagnosis and the treatment given to you
 - your appointment and billing details
 - any other information about your race, sexuality or religion, when collected by a health service provider.

Personal information means information we hold about you from which your identity is either apparent or can be reasonably determined.

We may, with consent, use email addresses to share news, tips, updates and special offers. People who receive these promotional emails can unsubscribe at any time.

We may use other data for a range of different purposes, provided we comply with applicable law and our contractual commitments. In some countries (for example, European Economic Area countries), local legal regimes may require us to treat some or all of other data as “personal data” under applicable data protection laws. Where this is the case, we will process other data only for the same purposes as “personal data” under this Privacy Policy.

We work with third-party services in Australia and the rest of the world (such as our practice management software) that we allow access to Personal

Information and may use it on our behalf strictly for the purposes for which they are engaged. We minimise the amount of personal data that is utilised by these services, and we have ensured that these services process your data in accordance with the appropriate regulations.

HOW WE COLLECT AND HOLD PERSONAL INFORMATION

We will generally collect personal information:

- from you directly when you provide your details to us. This might be via a face to face discussion, telephone conversation, registration form or online form
- from a person responsible for you
- from third parties where the Privacy Act or other law allows it - this may include, but is not limited to: other members of your treating team, diagnostic centres, specialists, hospitals, Medicare, your health insurer.

LINKS TO OTHER SITES

The Connect The Dots Psychology website may contain links to other external sites. We are ultimately not responsible for the privacy practises or the content of such external websites. We encourage you to read and understand the privacy policies on those websites prior to providing any information to them.

THE PURPOSES FOR WHICH WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

We use personal information you provide only for purposes consistent with the reason you provided it, or for a directly related purpose. Generally, we will not use your personal information to market to you unless we have either your implied or express consent but in situations where it is impractical to obtain your prior consent, we will ensure you have an ability to opt out of such future communications.

We do not share your personal information with other organisations unless you give us your express consent, or where sharing is otherwise required or permitted by law, or where this is necessary on a basis to enable our contractors to perform specific functions.

Generally, Connect The Dots Psychology will collect personal information directly from you, and only to the extent necessary to provide a product or service, or to carry out our internal administrative operations.

We may collect personal information from you when:

- You fill in an application form, or register for a service or event;
- Deal with us over the telephone;
- E-mail us;
- Ask us to contact you after visiting our website; or
- Have contact with us in person.

You may also be able to transact with us anonymously or use a pseudonym where this is lawful and practicable. We will collect personal information from you by lawful and fair means and not in an unreasonably intrusive way.

We will use your personal information only for the particular purpose that you provided it, or for a directly related purpose. Other potential ways we may use your Personal Information:

- to provide health services to you;
- to communicate with you in relation to the health service being provided to you;
- to comply with our legal obligations, including, but not limited to, mandatory reporting under applicable child protection legislation;
- to help us manage our accounts and administrative services, including billing, arrangements with health funds, pursuing unpaid accounts, management of our ITC systems;
- for consultations with other doctors and allied health professional involved in your healthcare;
- for identification and insurance claiming;
- To liaise with your health fund, government and regulatory bodies such as Medicare, the Department of Veteran's Affairs and the Office of the Australian Information Commissioner (OAIC) (if you make a privacy complaint to the OAIC), as necessary.

We may otherwise use your personal information where that other use is:

- Required or permitted by law; or

- With your express or implied consent.

DIRECT MARKETING AND YOUR PRIVACY

We only conduct direct marketing utilising healthcare information with your direct consent. We will always give you a choice to opt out of receiving such information in the future.

From time to time we may use the non-sensitive personal information we collect from you to advise you of, for example, conferences, events, products and/or services, which we believe may be of interest to you. We may then contact you to let you know about these products and services and how they may benefit you. We will generally only do this with your consent, and we will always give you a choice to opt out of receiving such information in the future.

ELECTRONIC MARKETING

Where we use your personal information to send you marketing information by email, SMS, MMS or other electronic means we may do so with your express or implied consent. You may give us your express consent by, for example, ticking a box on an electronic or paper form where we seek your permission to send you electronic or other marketing information.

YOUR PRIVACY PREFERENCES AND CHOICES

Every personalised marketing contact sent or made by Connect The Dots Psychology will include a means by which customers may opt out of receiving further marketing information. You may instruct us at any time to remove any previous consent you provided to receive marketing communications from us.

INFORMATION SHARING

We have a strict duty to maintain the privacy of all personal information we hold about you. However, certain exceptions do apply. For example, where disclosure of your personal information is:

- Authorised or required by law, e.g. disclosure to various government departments and agencies such as the Australian Taxation Office, Centrelink, Child Support Agency or disclosure to courts under subpoena.

- In the public interest, e.g. where a crime, fraud or misdemeanour is committed or suspected, and disclosure against the customer's rights to confidentiality is justified.
- With your consent, this may be implied or express, verbal or written.

USE OF THIRD PARTY SERVICE PROVIDERS

When we provide personal information to companies who perform services for us, such as practice management software companies or other contractors to the Company we require those companies to protect your personal information as diligently as we do.

UPDATING YOUR INFORMATION

It is inevitable that some personal information which we hold will become out of date. We will take reasonable steps to ensure that the personal information which we hold remains accurate and, if you advise us of a change of details, we will amend our records accordingly.

ACCESS TO YOUR PERSONAL INFORMATION

Connect The Dots Psychology will, upon your request, and subject to applicable privacy laws, provide you with access to your personal information that is held by us. However, we ask that you identify, as clearly as possible, the type/s of information requested.

Connect The Dots Psychology will deal with your request to provide access to your personal information in a reasonable time of receipt of your request.

Connect The Dots Psychology will not charge you for lodging such a request but we may recover from you our reasonable costs incurred in supplying you with access to this information.

You can request access to the Personal Information you have provided to us, via email. This enables you to receive a copy of the data and to check that we are lawfully processing it.

If you think there's a problem with the Personal Information we hold about you, you will either have the tools available to make these changes, or you can request a correction. This enables you to have any incomplete or inaccurate data we hold about you corrected (though we may need to verify the accuracy of the new data you provide to us).

Should you require to move your data to another service, you may request the transfer of your data (including Personal Information) to you or to a third party. We will provide to you, or a third party that you have chosen, your data in a structured, commonly used, machine-readable format.

You may withdraw consent at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. This will be notified to you at the time of your request if applicable.

EXCEPTIONS

Your right to access your personal information is not absolute. In certain circumstances, the law permits us to refuse your request to provide you with access to your personal information, such as circumstances where:

- Access would pose a serious threat to the life or health of any individual;
- Access would have an unreasonable impact on the privacy of others;
- The request is frivolous or vexatious;
- The information relates to a commercially sensitive decision making process;
- Access would be unlawful; or
- Access may prejudice enforcement activities, a security function or commercial negotiations.

FREEDOM OF INFORMATION LAWS

In addition to privacy laws, you may have rights to access your personal information contained in certain Company documents. Details on how to apply for access to these documents are contained in the Freedom of Information Act 1982 (FOI Act).

SECURITY

All reasonable steps will be taken to keep secure any personal information, which is held or transmitted. Security measures are taken to protect your information from misuse, interference and loss and from unauthorised access, modification or disclosure.

Where we have given you, or where you have chosen security codes (e.g username, password, memorable word or PIN), which enable you to use any online service, you are responsible for keeping these security details confidential.

On a regular basis, Connect The Dots Psychology will perform a periodic technical and nontechnical evaluation that establishes the extent to which Connect The Dots Psychology or Connect The Dots Psychology's business associate's security policies and procedures meet the security guidelines of the Office of Australian Information Commission for the Australian Privacy Principles.

The public internet is not a secure method of transmitting information. Accordingly, no responsibility is accepted for the security of information you send to or receive from us over the internet or for any unauthorised access or use of that information.

Should Connect The Dots Psychology discover a breach of data held, reasonable steps will be taken to notify those affected by the breach as soon as possible including how the breach occurred, possible effect and data affected, time of breach/es and remedies taken in accordance with Notifiable Data Breaches (NDB) scheme. To the extent permissible at law, in the event that there is a breach and indirectly collected information is at risk, we will follow the same protocol, however the affected Customers (rather than the individuals) will be notified instead.

DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

If Connect The Dots Psychology transfers personal information to countries outside Australia, we will only do so in compliance with all applicable Australian data protection and privacy laws.

COMPLAIN ABOUT A BREACH OF THE AUSTRALIAN PRIVACY PRINCIPLES

Connect The Dots Psychology is committed to working to obtain a fair resolution of any complaint or concern about privacy.

To contact us with a compliment, complaint or a privacy question, you can write to us at: Level 10, 95 North Quay, Brisbane, QLD 4000, or call the Connect The Dots Psychology: 0455 298 274. We will respond within 30 days.

Alternatively, If you are not satisfied with the response you receive from Connect The Dots Psychology you may contact the Office of the Australian Information Commissioner (OAIC) by:

Writing to GPO Box 5218, Sydney, NSW, 2001; or Calling 1300 363 992.

CHANGES TO THIS PRIVACY POLICY

This policy is current from July/2021. Connect The Dots Psychology may amend this Privacy Policy from time to time. We suggest that you visit our website regularly to keep up to date with any changes.