



# Policy: Privacy

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## Policy: Privacy

### Introduction

Allay Health Services Pty Ltd Trading as Allay Occupational Therapy has created this privacy statement in order to demonstrate our firm and continuing commitment to the privacy of personal information provided by those visiting and interacting with Allay. We hold the privacy of your personal information in the highest regard. The following discloses our information gathering, dissemination and safeguarding practices. This policy will be continuously assessed against new technologies, business practices and our customer needs.

Allay is subject to the National Privacy Principles under the Privacy Act 1988 as amended from time to time. This Privacy Statement applies to any personal information you provide in connection with our service.

### Team Responsibilities

To read, understand and follow the Privacy Policy and relevant Procedures.

### Scope

This Procedure applies to all Allay Occupational Therapy team members, receptionists, volunteers, students and clients.

### Policy

#### Information Collection

Allay gathers personal information through a variety of methods including electronic or face to face interactions, interaction with our website, requests for information, and provision of goods and services. We may also collect personal information directly from individuals, or their authorized representatives, and through referrals from other service providers.

We only gather information that is essential or beneficial in ensuring quality of service, such as contact details, next of kin, racial or ethnic origin, medical history, and/or other information that is deemed relevant to the services sought by the individual or referring party.

If personal information is required for a secondary reason like marketing or newsletters, we provide you with an opportunity to opt out.

Our website, like most, collects non-personally identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, and the date and time of each visitor request. Allay's purpose in collecting non-personally identifying information is to better understand how our visitors use its website. By using the Allay website, you consent to the data practices described in this statement.

#### Use of Information

Allay uses the information gathered for the purposes of administering our business activities, providing the products and services you requested, to process your payment, to monitor the use of the service, our marketing and promotional efforts, and improve service offerings. Allay may also contact you to conduct research about your opinion of current services or of potential new services that may be offered.

## Disclosure of Personal Information to Third Parties

In general, information will only be provided to third parties (e.g. teachers, doctors, therapists) if the information is required to ensure effective service provision and with your consent. Consent forms are completed prior to commencing services. Allay Occupational Therapy may also share data with other providers to deliver the requirements of services you have requested, for example builders or suppliers of equipment, you can opt out from your requested service by informing your occupational therapist.

Allay does not use or disclose sensitive personal information, such as race, religion or political affiliations, without your explicit consent.

During direct debits of credit cards, your credit card number and expiry date will be entered into our EFTPOS facility. This is operated by National Australia Bank. They will have their own Privacy Policy so we advise you to contact NAB if you have concerns regarding your credit card details being entered into their facility.

Other than the above and as otherwise expressly stated elsewhere in this Privacy Statement, we will not disclose your personal information without your consent unless disclosure is either necessary to prevent a threat to life or health, authorised or required by law, reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity.

## Access to and Correction of Information About You

Allay will, on request, provide you with access to the information we hold about you, unless there is an exception, which applies under the National Privacy Principles, including for the purpose of correcting or updating that information. We will arrange a mutually agreeable time for supervised access to your personal information. We may recover from you our reasonable costs of supplying you with access to the information we hold about you. Your request must be in writing to the leadership team and will be addressed within a reasonable time. If we refuse to provide you with access to the information we hold about you, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the National Privacy Principles.

## Keeping Your Personal Information Up To Date

We take reasonable steps to ensure that the personal information we hold about you is accurate, complete, and up-to-date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action.

## Storage and Security of your Personal Information

Information that may be collected is stored securely in our cloud based practice management software, Cliniko. Hard copies of some documents are also stored in a single client file. Assessment scores with name and age data, are also entered into online programs, Q- Global, Pearson and WPS Publish, for analysis. We use other online programs such as Tali Train, ILS and TIS Interpreting Service which require demographic data. We take reasonable steps to protect the security of your personal information in accordance with this Privacy Statement. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure. While we strive to protect such information, we cannot ensure or warrant the security of any information you transmit to us accordingly, use is at your own risk. Programs used also have their own Privacy Policy which we recommend you read if you have concerns about this practice management software and program. Once any personal information comes into our possession,

we will take reasonable steps to protect that information from misuse and loss and from unauthorised access, modification or disclosure.

## Resolving Your Concerns

If you wish to gain access to your personal information, have a complaint about a breach of your privacy or you have any query on how your personal information is collected or used please forward your request via post, email or phone. We will respond to your query or complaint as soon as possible. If there is a data breach, we will act according to the Privacy Act 1988 guidelines, act to remedy the breach immediately and notify you with the actions required. If it is a Notifiable Data Breach, we will do these aforementioned steps as well as notify the Office of the Australia Information Commissioner.

## Changes to this Privacy Policy

We may amend this Privacy Policy as our business requirements or the law changes. Any changes to this Privacy Policy will be updated on our website, please re-visit the Statement to ensure that you are aware of our most current privacy statement.

## Contact

Should you need to contact Allay, please email via our website, phone on (03) 5201 0527 and request to speak to the leadership team, or post a letter informing of your request. We will respond to your request as soon as possible.

## Further Information

For further information about the protection of your privacy, please visit the Australian Federal Privacy Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au) If you would like a copy of our Privacy Policy, please request one via our Contact page, phone or post.

## Quality and practice improvement

Allay leadership will ensure that all occupational therapists are aware of this policy.

This policy will be reviewed every two years to ensure relevancy.