

Privacy Policy

This privacy policy (this Policy) explains how we collect, use, disclose, store and protect your personal information. This Policy also describes how you may access or correct the personal information we hold about you, and how to contact us if you would like to make a privacy complaint. BELINDA CLARK ABN 66 564 148 306 ("we", "our", "us") is committed to protecting the privacy of your personal information. Personal information includes any information or opinion, whether true or not, about a person who is identified or whose identity can reasonably be established. We will handle your personal information (including health information) in compliance with the Privacy Act 1988 (Cth) ("Privacy Act") and the applicable Australian Privacy Principles in the Privacy Act when handling personal information, together with the Health Records Act 2001 (Vic) ("Health Records Act") and the applicable Health Privacy Principles in the Health Records Act when handling personal information which is health information ("Health Information"). We will also handle your personal information in compliance with the relevant Victorian State health records laws and other applicable privacy laws.

What is personal information?

This Policy applies to our handling of 'personal information'. Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable. It does not matter whether the information or opinion is true or not, or whether the information or opinion is recorded in material form. Personal information includes 'sensitive information', which is a type of personal information that has more protection under the privacy laws. It includes 'health information' (defined below), and information about a person's: race or ethnic origin; political opinions; membership of political, professional or trade associations or trade unions; religious beliefs; sexual orientation or practices; and criminal record. 'Health information' is a type of both personal information and sensitive information. It includes information or an opinion about: a person's health, a person's wishes about the future provision of a health service, or a health service provided or to be provided to a person; and other personal information collected to provide or in providing a health service to a person. References in this Policy to personal information include sensitive information and health information.

Why do we collect personal information?

We may collect personal information from you so that we can provide services to you if you are a client, or to manage our relationship with you if you are a person other than a client, or where this is otherwise necessary for our functions or activities.

We may collect your personal information:

- to provide you with health services and other services;
- to provide you with information regarding our services;
- to arrange billing with you for our services, or
- to obtain your consent to the above services and activities.
- to understand and assess your health and other needs.
- to communicate with you in relation to the health service being provided to you.
- to provide you with ongoing treatment options.
- to respond to feedback.
- to address a complaint.
- to charge, bill, or process Medicare and health insurance claims, and enable health insurance funding.
- to comply with legal and regulatory obligations.
- to communicate with you about our services and options available.
- to verify your identity.
- to respond to your enquiries.
- to manage our relationship with you and/or transact with you.

The kind of personal information we may collect will depend on who you are (e.g. a client or third party service provider) and the nature of your interactions with us, and may include your full name, address, email address, telephone number, date of birth, Medicare details, billing information, general appointment information, occupation, marital status, gender, medical

history and other health information, religion, where you were born, whether you identify as an Aboriginal or Torres Strait Islander person, and other personal information.

How do we collect your personal information?

We will collect personal information directly from you when it is practical to do so. This might be via face-to-face, telephone or telehealth discussions, email correspondence, or online forms. Sometimes we may need to collect personal information about you from someone else to provide care and services. This could include: a responsible person or representative (e.g. guardian); your other health service providers (including hospitals and specialist clinics); your GP or another health professional who has treated you; your insurer; your family; or other sources. We will only do this with your consent, or where it is not practical to obtain this information from you, and this is otherwise permitted by the privacy laws. We will also use your personal information where we are otherwise required or authorised by law to do so, which may include where it is unreasonable or impracticable to obtain your consent and the use is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety.

Notifying you about the collection:

When we collect your personal information, we will take reasonable steps to notify you of the details of the collection (including notifying you through this Policy), such as:

- the purposes for which the information was collected;
- the organisations (if any) to which the information will be disclosed; and
- to notify you that this Policy contains details on how you may access or correct your information, or raise any complaints.

Do you need to provide your personal information?

You are not required to disclose your personal information to us. However, if you do not provide the information requested, we may not be able to provide you with appropriate services or treatment, or provide you with relevant information regarding our services; or if you are another person engaging with us, we may not be able to work or transact with you. By contacting us or engaging with us in-person, by email or telephone or telehealth, completing online forms, or otherwise engaging our services, you consent to us collecting, using and disclosing your personal information (including Health Information) for the purposes specified in this Policy.

Do we disclose your personal information to others?

We will generally only disclose your personal information to other persons for the main purposes for which you have provided it to us. For example, if you are a client, we will generally only disclose your personal information to your referring health professional/s for the continuation of your healthcare. If you are a person other than a client (such as a service provider), we may disclose your personal information to manage our relationship with you. We will otherwise only disclose your personal information to other persons: for other purposes for which you have provided consent; for purposes which are directly related to these main purposes for which the information was collected, in circumstances where you would reasonably expect us to disclose your information for these purposes; and where we are otherwise required or authorised by law to do so, for example: where disclosure is necessary to comply with our legal obligations, such as mandatory reporting to relevant authorities under applicable laws; or where it is unreasonable or impracticable to obtain your consent and we reasonably believe disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety.

If you are a client, we may disclose your personal information to:

- When consulting colleagues, or in the course of supervision or professional training, provided the identity of clients and associated parties involved are concealed
- Insurers, including your private health insurers or our insurer. Some insurers may be located interstate or overseas.
- Government and regulatory bodies such as Medicare, the Office of the Australian Information Commissioner (for example, if you make a privacy complaint) or State or Territory statutory health complaints bodies, as necessary. If you have provided us with authority, we can give your authorised representative or lawyer access to your personal information.

Data security and quality:

We store personal information in both paper and electronic form. The security of personal information is important to us. We take reasonable steps to protect this information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Some of the ways we do this include:

- maintaining confidentiality;
- implementing document storage security;
- using the Certified online practice management software “Cliniko” to manage client records (<https://www.cliniko.com/policies/privacy/>);
- providing a discreet environment for confidential discussions;

We will keep your personal information for the minimum time period required by law. Once this time has passed your information may be disposed of, unless legal or organizational requirements specify otherwise.

How can you access your personal information?

You have a right to request access to the personal information that we hold about you. You can do this by contacting us using our contact details provided below. If you wish to request access to your personal information, you will need to make the request in writing (include your contact details and specify the information you are requesting and in what form (hard copy or soft copy)) and provide a copy of your identification (e.g., Driver’s licence) so that we can confirm your identity. We may ask you to complete a request for information form. We will generally respond to your request within 30 days. If we grant access to your personal information, we will try to provide it in the form you request. If that is not possible, we will provide a different way to access the information or outline how access can be given through alternative means. In certain circumstances, we may refuse to allow you access to your personal information where this is authorised by the law. For example, where providing access would have an unreasonable impact on the privacy of other individuals, providing access would pose a serious threat to the life or health of any person or to public health or safety, giving access would be unlawful, or the request is frivolous or vexatious. If we refuse your request for access, we will let you know in writing our reasons for the refusal. We will also explain how you can complain if you are not satisfied with our reasons. We may charge a fee for collating and providing access to personal information in accordance with applicable laws.

Quality of the personal information we hold:

We take all reasonable steps to ensure that the personal information we handle is accurate, complete, up-to-date, relevant and not misleading. You have a right to request the correction of personal information we hold about you. You can request a correction by contacting us using the contact details below. We will take reasonable steps to correct the personal information we hold if we are satisfied it is inaccurate, incomplete, out of date, irrelevant or misleading. The accuracy of the information we hold also depends on the quality of the information provided to us. To help us ensure the accuracy of your personal information, we ask that you please:

- let us know if there are any errors in your personal information, and
- update us with changes to your personal information (e.g. name and address).

Sometimes we may refuse a request for correction. If this happens, we will let you know in writing our reasons for the refusal. We will also explain how you can complain if you are not satisfied with our reasons.

Website privacy:

You can generally interact with us via our website (www.belindaclarkosteopath.com – hosted by Wix.) anonymously. The servers may collect the following details:

- the date and time you visited our website;
- our pages and/or documents that you visited;
- your computer address;
- the browser you are using.

Personal information will not be collected through our website without your consent. The website uses cookies. Cookies are small data files that are stored on your device’s browser. They allow us to interact more effectively with your device. Cookies will not identify you, but they do identify your ISP (Internet Service Provider) and browser type. We do not collect personal information through cookies. You can choose whether to allow cookies through your browser settings. However, some

functions on our website may not work if you disable cookies. If we provide links to other organisations' websites, we are not responsible for the content, privacy policies or practices of the other organisations.

How can you make a complaint or find out more information?

If you have any questions about privacy, this Policy or the way we manage your personal information, or if you believe that we have breached your privacy rights and wish to make a complaint or raise a concern, please contact us using the contact details provided below.

Changes to this Policy

We may review, change and update this Policy to reflect our current practices and obligations and changes in technology. We will publish the current version of this Policy on our website at www.belindaclarkosteopath.com. The changes will take effect at the time of publishing. You should review this Policy regularly and remain familiar with its terms. By continuing to use the Website and/or our service following any changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Privacy Policy, as amended from time to time, in whole or in part, you must terminate your use of the Website and inform us immediately and before any further receipt of our services. A copy of this Policy is also available by contacting us.

Our contact details

If you wish to seek access or correct your personal information, or if you have a privacy-related question or complaint you would like to raise, please first contact us at belindaclarkosteopath@gmail.com or in writing to Belinda Clark Osteopath 1a Albert st Mornington. If you are not satisfied with our response, or if you do not wish to contact us directly, you can contact the Office of the Australian Information Commissioner via:

Website: www.oaic.gov.au

Phone: 1300 363 992

In writing: Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW

For further information on your privacy rights, go to:

<https://www.oaic.gov.au/privacy/privacy-guidance-for-organisations-and-government-agencies/health-service-providers/guide-to-health-privacy>

<https://ovic.vic.gov.au/privacy/for-the-public/your-privacy-rights/>