

PRIVACY POLICY (AUSTRALIA)

PURPOSE

Thank you for accessing our Privacy Policy.

We are The Spot for Speech Pathology PTY LTD with Australian Business Number 18 795 974 643.

We are committed to protecting your privacy in your dealings with us. This policy explains how we manage personal information, what kinds of personal information we hold, why we hold it and how we collect, store and handle it.

Like most private businesses in Australia, we are bound by the Privacy Act 1988 (Cth) (including the Australian Privacy Principles) (the Privacy Laws). This Policy is intended to reflect our obligations under the Privacy Laws.

Please let us know if you would like us to email you a copy of this policy.

When we refer to 'clients' or 'you' below, we mean both former and current clients, as well as people who make enquiries about our products and/or services (i.e. potential clients).

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

In this policy, 'personal information' refers to information or an opinion about an individual whose identity is apparent or can reasonably be ascertained. To provide evidence-based speech pathology services to our clients, we need to know personal information about them and others including:

- Names, ages, genders and other identifying information;
- Medicare and health fund details including Medicare numbers and health fund insurers and the extent of coverage;
- Developmental, medical, ethnic, language, cultural and social histories (including medications, diagnoses, surgeries and allergies);
- Disabilities and impairments;
- Family histories, to the extent that they may be relevant to our assessment, diagnosis and/or treatment of clients;
- Work and educational histories;
- Hobbies, motivations, interests and activities in which clients and their families participate; and
- Financial information concerning the ability to pay for our products and services

For sensitive information – such as information about you or your child's health that is reasonably necessary for us to provide you with products or services – we will seek your consent.

HOW DO WE COLLECT PERSONAL INFORMATION?

We collect personal information by telephone (e.g. when you first call us to book an appointment for yourself or your child), via our website, pages on our social media sites (e.g. on our Facebook or Instagram sites), through our client questionnaires (which are usually filled in by a client or carer as part of our assessment process), by written letters, reports and other documents (e.g. through doctors reports you provide to us), through emails, SMS and other forms of electronic communication, and in interviews and other interactions in our sessions (including face-to-face meetings and meetings conducted electronically by way of Skype, Zoom or similar).

WHO DO WE COLLECT PERSONAL INFORMATION FROM?

We collect personal information from clients or someone authorised to act on behalf of the client (e.g. their parents, carers or guardians). Wherever practicable, we will ask for the information directly. However, we may need to contact others where relevant to a client's circumstances (e.g. when working with clients who cannot communicate their needs without the assistance of others). In these cases, we will, where practicable, make you aware of the fact that we have collected this information and the circumstances of the collection.

When you give us information about other people, we rely on you to have obtained their prior consent and to tell them the types of third parties we may provide the information to and why.

WHY DO WE COLLECT PERSONAL INFORMATION?

We collect personal information to deliver, review and improve the products and services that we provide. Generally, these products and services relate to speech pathology. If we didn't collect this information, we wouldn't be able to carry out our business or provide products and services to you in accordance with the standards required by law and the Speech Pathology Australia Code of Ethics. If you do not provide the personal information that we request, we would not be able to carry out our business and provide our products and/or services to you.

More specifically, we need personal information (including health information) to provide clients with assessment, diagnosis and management products and services related to their speech, language, literacy, voice, swallowing, multi-modal communication, social or fluency needs. We also need this information for:

- Administrative purposes of managing our business
- Fulfilling our obligations under law, regulations and/or Speech Pathology Australia's Code of Ethics
- Billing management (either directly or through insurers or other compensation agencies)
- Discussions between speech pathologists and others working at our clinic/places of work (including sub-contractors) related to the care of our clients
- Discussions and other communications with your doctors, other health professionals and educational professionals in relation to our client's care
- Discussions with insurers; and
- For any insurance, compensation or other claims or litigation (including threatened litigation)

From time to time, we may use personal information (but not sensitive health information) to provide you with news or offers about our products and/or services that may be of interest to you. These products and services will be related to our speech pathology business described above and will be products and services that will be relevant to you. You have a right, at any time, to tell us that you don't want to receive this type of material.

CAN PEOPLE ACCESS OUR PRODUCTS AND SERVICES ANONYMOUSLY?

No. Due to the nature of our services and products, we cannot offer them to people who wish to be anonymous, wish to use a pseudonym or who do not provide us with enough information to properly identify them for the purposes of providing services and products.

WHO WILL SEE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION?

Your information may be seen or used by people working for or on behalf of The Spot for Speech Pathology and other service providers including (without limitation):

- Our director
- Our speech pathologists (employed or contracted)
- Our administrative staff (employed or contracted)
- Doctors, other health professionals and/or educational professionals

- Our third-party professional advisors and service providers, including (without limitation) our lawyers, book-keepers, accountants, auditors, tax consultants, actuaries, management consultants and IT service providers (including software-as-a-service providers); and
- Medicare, private health insurance providers, NDIA, our insurers and reinsurers

We will not rent, sell, trade or otherwise disclose to any other third-parties personal information about you or your child without your consent unless it is required by law (including pursuant to a court or tribunal order), or where a threat to health or welfare of any person exists as we are mandatory reporters under the Children and Young Persons Act 1998.

SECURITY OF YOUR PERSONAL INFORMATION AND DATA RETENTION

We know that you are concerned about your personal information – especially your health information. We will use reasonable endeavours to prevent unauthorised access to, modification of, disclosure, misuse or loss of information as required by law.

Our director and staff have reviewed the requirement of the Privacy Laws and our third-party service providers have been made aware that they are required to comply with the requirements of the Privacy Act 1988 (Cth).

We have data protection measures in place (including password-locked computers and other electronic devices) where we store personal information electronically. Our hard copy health records are stored in locked filing cabinets on site accessible to only authorised staff.

If we no longer need personal information about you or your child for any purpose as described above, then we will take reasonable steps to destroy information or to ensure such information is de-identified. This obligation is subject to an important exception for NSW practitioners, the Health Records and Information Privacy Act 2002 (NSW), we are obliged to retain health information:

- (a) Regarding adults for 7 years from the last time we provided them with a product or service; and
- (b) Regarding children, until the individual has attained 25 years of age.

ACCESS TO AND ACCURACY OF YOUR PERSONAL INFORMATION

We take reasonable steps to ensure that personal information we collect about or from you is accurate, complete, up-to-date and relevant wherever it is used, collected or disclosed. Subject to the recognised exceptions to access for organisations contained in the Australian Privacy Principles (APP12.3), you have a right to access your information if you wish (subject to any privilege or legal restrictions); and, if it is reasonable and practicable to do so, we will give you access to the information in the manner requested by you. By law we may charge you a reasonable fee to cover the cost of retrieving and processing the information.

If you believe personal information that we hold about you is inaccurate, out of date, incomplete or misleading, we will, upon receipt of your request, take steps that are reasonable in the circumstances to correct the information.

WHAT HAPPENS IF PERSONAL INFORMATION IS DISCLOSED OUTSIDE AUSTRALIA?

Given the increasing globalisation of electronic information systems and the business of service providers, it is likely that personal information may be disclosed to a person or entity outside Australia (e.g. to a third-party service provider managed outside Australia). For the same reason, it is not practicable to specify the countries in which such recipients may be located.

If your personal information is disclosed by us to an overseas recipient (e.g. to an insurer or IT service provider), we will take reasonable steps in those circumstances to ensure the overseas recipient does not breach the Australian Privacy Policy Principles in relation to the information.

COMPLAINTS

If you believe your privacy has been prejudiced by something we have done or failed to do, you have a legal right to lodge a complaint.

Our Privacy Officer is Beck Mungoven who can be contacted by phone on 0423 384 604 or email at beck@spotforspeech.com.au

We will respond to you in writing within 14 calendar days of receiving your complaint.

HOW WE HANDLE YOUR PERSONAL INFORMATION WHEN YOU VISIT OUR WEBSITE

This section of our Privacy Policy explains how we handle your personal information that is collected from our website: www.spotforspeech.com.au

This Privacy Policy applies to your use of our website and the use of any facilities on our website.

When you use our website, we do not attempt to identify you as an individual user and we will not collect personal information about you unless you specifically provide this to us. Sometimes we may collect your personal information if you choose to provide this to us via email.

When you use our website, our Internet Service Provider (ISP) may record and log, for statistical purposes, information about;

- Your computer address;
- Your top level name (e.g. .com, .gov, .org, .au etc.)
- The date and time of your visit
- The pages and documents you access during your visit; and
- The browser you are using

We may create links to third-party website. We are not responsible for the content or privacy practices employed by websites that are linked from our website.

We will use any personal information collected via our website in accordance with our Privacy Policy.

WANT MORE INFORMATION?

If you have any questions about this policy, or have any concerns about the personal information you or others have given us about you, please contact us on 0423 384 604.

More information on the Privacy Act 1988 (Cth) can be found on the website of the Office of the Australian Information Commissioner.