

# Privacy Policy

## 1. About this Policy

- 1.1. The *Privacy Act 1988* (Cth) (**Act**) requires certain entities to comply with the Australian Privacy Principles and to have a privacy policy. This privacy policy outlines the personal information handling practices of VJ Psychology Pty Ltd (**VJ Psychology**).
- 1.2. This policy is written in language which is simple and accessible. The particular legal obligations which VJ Psychology has when handling your personal information can be found in the Act. Whenever we update our practices with respect to information handling we will update this policy accordingly.

## 2. Overview

- 2.1. As part of our ordinary business operations we often hold, use and disclose personal information. These operations and activities include:
  - (a) providing serviced offices for allied health counselling;
  - (b) invoicing clients and patients of the treating practitioners on behalf of the treating practitioners;
  - (c) booking in consultations for clients with the treating practitioners.
- 2.2. For the avoidance of doubt, our business operations **do not** include treating patients or providing allied health counselling services – those services may however be provided by practitioners operating from our premises.

## 3. Collection of your personal information

- 3.1. We may collect information as part of our business activities. The usual way we obtain personal information is when you provide that information to us including but not limited to via email, hard copy forms, over the telephone or via our websites. The other way we obtain your personal information is via health practitioners, counsellors or community service providers by way of referrals through written correspondence, over the telephone and in medical reports.
- 3.2. We may collect personal information such as your contact details, Medicare number, what services you are seeking, your medical history and your date of birth when you contact us to request an appointment for treatment with a practitioner.
- 3.3. We may also collect your personal information if you are a business associate or partner and have made such information available to us.
- 3.4. We **do not** collect personal information about your session consultation or treatment by your treating practitioner including consultation notes - this information is controlled and kept by the practitioner. This personal information is owned, maintained, and stored by the practitioner, and not VJ Psychology. Enquiries or concerns about personal information related to the consultations, treatments and health information should be directed to the treating practitioner.

### ***Sensitive Information***

- 3.4. We almost never collect sensitive information about you such as your racial or ethnic origin, political opinions, association memberships, religious beliefs, sexual orientation, criminal history, genetic or biometric data.
- 3.5. The only reason we would collect sensitive information of this type is if it is reasonably necessary to the provision of our services and if the information is volunteered by you. An example would be if you have a health issue or disability which may require special consideration in the way the practitioner delivers their service.

### ***Indirect Collection***

- 3.6. There may also be occasions on which we collect personal information about you indirectly from other sources such as:
  - (a) publicly available information; and
  - (b) your agents or authorised representatives.
- 3.7. We may obtain information from a credit reporting body (**CRB**) with contained personal credit information about you including your credit history. We would do this, albeit very rarely, to assess enquires and to make a credit risk assessment in relation to you before undertaking work and services.

### ***Anonymity***

- 3.8. Where it is practical to do so, you may be able to interact with us anonymously or by using a pseudonym. For example, if you contact us with a general question or enquiry about our services or about booking in with a practitioner operating from our premises, we will not usually need to collect your personal information at that stage. Another example may be for domestic violence clients where only the treating allied health practitioner would know the true identity of the pseudonym.
- 3.9. You may also make complaints or feedback anonymously or under a pseudonym however, in some cases this may limit our ability to investigate a complaint. For example, we may be unable to investigate a complaint if we do not know which client it relates to.

### ***Collecting through our websites***

- 3.10. VJ Psychology has the following websites: **<https://www.visionpsychology.com>**, **[www.m1psychology.com](http://www.m1psychology.com)** There are a number of ways that we may collect information through the website from time to time:
  - (a) **Cookies** are data files transferred onto user devices by websites as a record and also to increase the functionality of the websites. If you do not want to accept cookies, you should set your browser preference to reject all cookies before accessing the websites.

- (b) **Analytics** tools such as Google Analytics collect information about your visit and interaction with our websites. The type of data that can be collected this way includes:
  - i. the IP address of your device;
  - ii. your device screen size;
  - iii. country of access;
  - iv. the referring domain or hyperlink (if applicable);
  - v. your device operating system, browser and type; and
  - vi. date and time when the websites pages were accessed.
- (c) **Email Lists** including collection of personal information when you sign up for mailing lists, newsletters or when providing feedback.
- (d) **Social Media** including information you volunteer when interacting with our social media accounts such as Facebook.

## 4. Disclosure

- 4.1. There are few situations where it is reasonably necessary to disclose your information to parties who are external to VJ Psychology. For example:
  - (a) we may disclose your information to allocated treating practitioners for the purpose of enabling the practitioner to deliver their services to you;
  - (b) we may disclose your information to agents or contractors where we are engaging a third party on our behalf to carry out the agreed work;
  - (c) in some circumstances, we may also disclose your information (with your consent) to business partners and professionals where you are in need of a referral in respect of services which VJ Psychology does not offer. This may include for example us providing a written report to a doctor, lawyer, etc.;
  - (d) if you are a contractor, we may disclose your information and identity to the patients; and
  - (e) we may disclose your credit information to a CRB in order to obtain a credit report, or in severe cases, to report a substantial credit default.
- 4.2. We may also make disclosure of your personal information where we are compelled by law to do so. For example, if we are served with a court-issued subpoena to produce documents or information.
- 4.3. Your personal information will not be used, sold, rented or disclosed for any other purpose.
- 4.4. In the event that unauthorised access, disclosure or loss of your personal information occurs VJ Psychology will outline a detailed plan and use all reasonable endeavours to minimise any risk of consequential serious harm.

### ***Overseas Disclosure***

- 4.3. We are unlikely to disclose your personal information to overseas recipients unless you consent or such disclosure is otherwise required by law. Our information and records are stored on a local server in Australia.

## **5. Quality of personal information**

- 5.1. To ensure that the personal information we collect is updated and accurate we record information consistently and promptly update our records where updated information is available.

## **6. Storage and security of personal information**

- 6.1. We protect the storage and security of your personal information by:
- (a) Periodically assessing the risk of misuse, loss, unauthorised access or modification of the information; and
  - (b) Taking measures to address those risks, for example, by educating staff about the importance of your privacy and the risks of mishandling of that information.
- 6.2. We may destroy personal information if it is no longer needed for our records or delivery of our services.

## **7. Accessing and correcting your personal information**

- 7.1. Australian Privacy Principles 12 and 13 state that you have the right to request access to all personal information we hold about you and that we correct that information if it is false or inaccurate. You can do this by contacting us via letter and we will respond within 30 days.
- 7.2. Before providing access to your personal information or correcting our records we will ask you to verify your identity.

### ***Accessing information about your treatment or consultation***

- 7.3. We confirm that we do not collect, own, maintain or control personal information about any session consultation conducted at our premises by your treating practitioner. Your principal line of enquiry when seeking such information is to the treating practitioner directly. Notwithstanding this, we are happy to assist you to contact the treating practitioner per the below process.
- 7.3. If you require access to your personal information about your session consultation (which we do not hold or own) then please provide us with an **original signed request made out directly to your treating practitioner.**
- 7.4. We will be unable to action any scanned or emailed request as we cannot sufficiently verify that the request has been actioned by you. All requests for this information should be submitted via post to the address outlined in clause 9.1 below with your practitioners name on the letter. We will then be able to provide your request to your practitioner. Please note we will use reasonable endeavours to obtain the information you are requesting however, we are not liable for ensuring your practitioner hands over this information.

## 8. How to make a complaint

- 8.1. If you are not satisfied with our handling of your personal information, we recommend you first contact us via letter and complain to us directly. We will respond to the complaint within 7 days and attempt to resolve the complaint within 30 days of the date of the complaint.
- 8.2. If you are not satisfied with our response to your complaint, you should contact the Office of the Australian Information Commissioner and complete a privacy complaint form.

## 9. How to contact us

- 9.1. You can contact us by:

<b>Details:</b>	VJ Psychology Pty Ltd ACN 141 698 348
<b>Telephone:</b>	(07) 3088 5422
<b>Post:</b>	Suite 377, 7 Clunies Ross Crt Eight Mile Plains, Q 4113