



## Policy for Management of Personal Information

This document describes the policy of clinicians and assistants associated with Emerge Psychology for the management of client's information. *We are committed to protecting the privacy of patient information and to handling your personal information in a responsible manner in accordance with the **Privacy Act 1988 (Cth)**, the **Privacy Amendment (Enhancing Privacy Protection) Act 2012**, the **Australian Privacy Principles and relevant State and Territory privacy legislation (referred to as privacy legislation)**.*

### 1. What is personal information?

1.1 'Personal information' is defined in the Act. Essentially, it means information from which your identity is reasonably apparent. This information may include information or an opinion about you (whether true or not) and may also include sensitive information. Purpose of holding information

The information is gathered as part of the assessment, diagnosis, and treatment of the client's condition, and is seen only by the psychologist and authorised practice administration. The information is retained to document what happens during sessions and enables the psychologist to provide a relevant and informed psychological service.

### 2. What personal information we collect

#### 2.1 Client Information

Client files are held in a secure filing cabinet or electronic systems that are accessible only to authorised persons by complex passwords. The information on each file includes personal information such as name, address, contact phone numbers, and other information which is relevant to the psychological service being provided.

The kinds of personal information that we collect, or hold may include your:

- name
- contact details (including postal address, email address and telephone numbers)
- date of birth
- payment information

- contact details of your next of kin

### 3. How we collect personal information

#### 3.1 We collect personal information in a number of ways, including:

- in the course of conducting our services
- correspondence and telephone calls
- in referrals received

Where practical, we use HIPPA compliant systems and we routinely use complex passwords and virus protection.

We minimise the information collected online as much as practical.

For example, we have your address on your referral, so we do not request this through our online booking system (Calendly). However, Calendly, Gotomeeting, Hostpapa and Message Media have their own privacy policies for personal data. We direct you to consider this and ask us if you would like further information. The following is not an extensive list but some examples for your consideration include the following:

In particular, Calendly appears to transfer personal data offshore as noted in its privacy policy. Using this site could infer that you are seeing a clinician at Emerge Psychology and users of this service are advised of this. Another example for your consideration is that Gotomeeting (LogMeIn) transfers personal data offshore, receives data from schedules and attendee lists. It uses Google Analytics and Adobe Marketing Cloud, plants cookies and use your personal data for combination and marketing. We can not avoid this on a practical level. If you are uncomfortable with this, please seek local face to face services as using our service infers agreement with our privacy policy and consent agreement.

### 4. Purposes of collection, use and disclosure

4.1 We may also collect, use and disclose your personal information for purposes which should be reasonably expected by you and are related to the above purposes;

- for other purposes to which you have consented; and as otherwise authorised or required by law

4.2 We may disclose personal information as follows for the above purposes:

- where you otherwise provide your consent, whether express or implied
- where otherwise required or permitted by law

4.3 Where practical, we will take reasonable steps to ensure that third parties to whom we disclose your personal information have a commitment to protecting your personal information at least equal to our commitment or are subject to confidentiality requirements in relation to that information or you have consented to us making the disclosure.

### 5. Overseas disclosure

Some of the third parties to whom we may disclose your personal information may operate globally and be located or based outside Australia (including the USA) so that they can provide us with services in connection with the operation of our business, such as data storage. The use of such third-party providers, where appropriate, may nevertheless be subject to further internal policies and protocols to better ensure that your privacy is protected.

## 6. Cookies

6.1 Cookies are pieces of information that the Emerge Psychology website transfers to your computer's hard drive for record keeping purposes. Most web browsers are set to accept cookies. We use cookies to make your experience of our website and services as convenient as possible. While cookies do not personally identify you, they do identify your browser. 6.2 Cookies are used to estimate the number of users and determine overall traffic patterns through our website. If you do not wish to receive any cookies, you can set your browser to refuse cookies. However, this may mean you will not be able to take full advantage of our services.

## 7. Storage and security of personal information

7.1 We take reasonable steps to ensure that the personal information we hold is secure and may only be accessed by authorised persons.

7.2 However, except to the extent that statutory liability cannot be excluded, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information.

Nothing in this Privacy Policy restricts, excludes or modifies any statutory consumer rights under any applicable law (including the Competition and Consumer Act 2010 (C'th)).

## 8. Access and correction

8.1 We strive to keep accurate, complete and up-to-date records of the personal information we collect, so far as practical. Accuracy depends on the information provided to us.

8.2 You have a right to seek access to your personal information held by us and that right extends to correction of the information if it is inaccurate, out-of-date or incomplete. To seek access to your personal information, please contact the Privacy Officer as set out below.

8.3 It is our policy to provide a summary of the personal information that we hold, rather than copies of individual documents. We do not provide access to evaluative information generated within the organisation in connection with commercially sensitive decision-making processes.

8.4 If we are unable to provide you with access to or correction of your personal information, we will provide you with a written notice that sets out the reasons for our decision and mechanisms available to you to lodge a complaint.

8.5 All requests for access and/or correction of personal information are subject to verification of the identity of the person making the request.

8.6 In the event that copies of individual documents are requested and we agree to meet that request, the fee for provision of documents via post, fax or email is \$1.00 per page (or such other reasonable fee as we specify), payable prior to delivery.

## 9. Questions and complaints

## Requests for access to client information

At any stage clients may request to see the information about them kept on file. The psychologist may discuss the contents with them and/or give them a copy. All requests by clients for access to information held about them should be lodged with the treating clinician. These requests will be responded to within "14" days and an appointment will be made if necessary, for clarification purposes.

## Questions

If you have any questions in relation to how we handle personal information, or wish to lodge a complaint about our management of personal information or a request for access to or correction of your personal information, please call our Operations Manager:

PO Box 3155 Brighton VIC 3186

- Email: [Markr@emergepsychology.com.au](mailto:Markr@emergepsychology.com.au)

Ph 1300 963 723

The Operations Manager will co-ordinate the investigation of any complaint and any potential resolution of a complaint. We will aim to resolve all complaints as soon as practicable.

## Concerns

If you have a concern about the management of your personal information, please inform your clinician. Upon request you can obtain a copy of the National Privacy Principles, which describe your rights and how your information should be handled. Ultimately, if you wish to lodge a formal complaint about the use of, or access to, your personal information, you may do so with the Office of the Federal Privacy Commissioner on 1300 363 992, or GPO Box 5218, Sydney NSW 2001

## 10. Changes to this Policy

We may change this Privacy Policy at any time. If we make changes to this Privacy Policy we will notify you by publication on our website. The revised version of this Privacy Policy will be effective at the time we post it. Last updated: Sept 2020