

## PRIVACY POLICY

This document describes the Privacy Policy of SeeChange Psychology and its commitment to the collection, management, use and disclosure of a client's personal information. The information provided to us, or otherwise collected by us, can be vis online or offline including through direct interaction at our SeeChange practice, via telehealth and or other online assistance, through other health practitioners including referrals, correspondence and medical reports and or through our websites, available at [www.seechangepsychology.com.au](http://www.seechangepsychology.com.au) and [www.seechangepsychology.au](http://www.seechangepsychology.au). The psychological services provided by SeeChange Psychology are governed by the legal requirements of the Australian Privacy Principles and the Privacy Act 1988 ("the Act"). In this Privacy Policy **we, us, or our** means SeeChange Psychology AU Pty Ltd ABN 63 659 295 100

### Collection of your sensitive information

#### What is sensitive information?

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation, sexual practices or sex life, criminal records, health information or biometric information.

#### How clients' sensitive information is collected

The type of sensitive information we may collect about you are are only accessible by your psychologist and the Practice Manager of SeeChange Psychology.

- ◇ we may collect detailed information about your physical and psychological health, relationship history and substance abuse history, criminal records, sexual history, your racial and ethnic origin, your religious beliefs, your philosophical beliefs, and your sexual orientation or practices.

#### Your consent

We will not collect sensitive information about you without first obtaining your consent.

#### What personal information do we collect?

As part of your clinical intake and assessment, we may gather personal information about you, including:

- ◇ your name;
- ◇ your contact details, including email address, mailing address, street address and/or telephone number;
- ◇ your age and/or date of birth;
- ◇ your Medicare details;
- ◇ details of your schooling/training/employment status;
- ◇ your marital status;
- ◇ your credit card or payment details (through our third-party payment processor); your sensitive information as set out above;
- ◇ details about the services we have provided to you and/or that you have enquired about, and our response to you;
- ◇ your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- ◇ information about your access and use of our services, including using Internet cookies, your communications with our online services, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- ◇ additional personal information that you provide to us, directly or indirectly, through your use of our services or trusted associated applications; and
- ◇ any other personal information collected as part of providing the psychological service including emails, chat records, and text messages.

We may collect these types of personal information directly from you or from third parties.

### **Your consent**

We will not collect sensitive information about you without first obtaining your consent.

### **The purpose of holding personal information**

We collect your personal information for the purpose of providing access to our psychological services, which includes assessing, diagnosing, and treating your presenting concerns. In addition, we collect, manage, use, and disclose your personal information:

- ◇ to arrange appointments; and check you in at our practice;
- ◇ for internal record keeping, administrative purposes, invoicing, and billing purposes;

- ◇ to enable your general practitioner or other referrer to refer you to us and/or book an appointment for you directly;
- ◇ to keep your general practitioner or other referrer up-to-date;
- ◇ to liaise with your private health care insurance provider;
- ◇ to enable you to access and use our trusted associated applications and associated social media platforms;
- ◇ for analytics, market research and business development, including to operate and improve our services, associated applications and associated social media platforms;
- ◇ for advertising and marketing, including to send you promotional information about our services and information that we consider may be of interest to you; and resolve any disputes that we may have; and
- ◇ if you have applied for employment with us; to consider your employment application. We may de-identify information you provide to us and use it for research purposes.

### **Disclosure of personal information**

A client's personal information will remain confidential unless:

- ◇ it is subpoenaed by a court, or disclosure is otherwise required or authorised by law; or
- ◇ failure to disclose the information would in the reasonable belief of the SeeChange Psychologist, place a client or another person at serious risk to life, health, or safety; or
- ◇ the client's prior approval has been obtained to provide a written report to another agency or professional, e.g., TAC, Workcover or Psychiatrist; or
- ◇ to discuss the material with another approved person, e.g., a parent, employer, school wellbeing person.

In addition, we may disclose personal information to:

- ◇ your general practitioner
- ◇ your private health care insurance provider
- ◇ other relevant third parties, where we make a clinical decision that we must disclose your personal information, based on an assessment of your best interests, considering your age, health, safety and any possible immediate or substantial risk to you.

- ◇ third party service providers for the purpose of enabling them to provide their services to you, including (without limitation):
  - our practice management cloud-based software Halaxy to manage your bookings, our clinical patient files and invoicing and billing requirements;
  - professional advisors (such as lawyers where required); and
  - payment systems operators (to process your payments);
- ◇ our employees, contractors and/or related entities;
- ◇ our existing or potential agents or business partners;
- ◇ anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- ◇ credit reporting agencies, courts, tribunals, and regulatory authorities, in the event you fail to pay for services we have provided to you;
- ◇ courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or to establish, exercise or defend our legal rights;
- ◇ third parties to collect and process data, such as Google Analytics or other relevant businesses. This may include parties that store data outside of Australia; and

By providing us with personal information, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with Australian Privacy law. We make no representations or warranties in relation to the privacy practice of overseas third parties as they may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act. If any third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

### **Disclosing your sensitive information**

Your personal information will not be used, sold, rented, disseminated, or disclosed for any other purpose. Provided you consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was given, including:

- ◇ to provide our services to you;
- ◇ to report to your general practitioner about your use of our services and our findings from the services;

- ◇ to refer you to medical or health service providers in emergency circumstances where it is impractical for us to obtain your consent; and
- ◇ to provide a relevant third party with information about you, where we make a clinical decision that we must disclose your sensitive information to a third party, including if you are at risk to self-harm, based on an assessment of your best interests, considering your age, health, safety and any possible immediate or substantial risk to you.
- ◇ Sensitive information may also be used or disclosed if required or authorised by law.

### Your rights and controlling your personal information

**Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, manage, use, and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect your use of our services.

**Anonymity:** In some circumstances, you may request to remain anonymous or to use a pseudonym. Where practicable we will give you the option of not identifying yourself in your dealings with us.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Restrict and unsubscribe:** To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the Email: [support@seechangepsychology.com.au](mailto:support@seechangepsychology.com.au).

**Correction:** At any stage you may request to view and correct the personal information about yourself kept on file. If you believe the information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, incomplete, misleading, or out of date. All requests for access to or correction of personal information should be lodged in writing with the SeeChange Practice Manager at Email: [support@seechangepsychology.com.au](mailto:support@seechangepsychology.com.au).

These requests will be responded to in writing within 30 days, and an appointment will be made, if necessary, for clarification purposes.

**Complaints:** At SeeChange Psychology, we are committed to providing a transparent and effective process for handling complaints. To align with the Complaints Handling Standards 2023, our Complaints Policy includes the following:

- ◇ Transparency: We ensure clear and accessible information on how to lodge a complaint and the process involved.
- ◇ Fairness: Our complaints process aims to be impartial and unbiased.
- ◇ Timeliness: Complaints are resolved promptly, adhering to clear timeframes.
- ◇ Accountability: Responsibilities for managing and resolving complaints are clearly defined.
- ◇ Improvement: We use feedback from complaints to drive continuous improvement in our services.

To lodge a complaint, follow these steps:

1. Submit Your Complaint: Provide a detailed description of your complaint, including any relevant documents and your contact information.
2. Initial Acknowledgment: We aim to acknowledge receipt of your complaint within three (3) working days.
3. Investigation: We will promptly investigate your complaint and respond to you in writing (via email) within five working days, detailing the outcome of our investigation and the steps we will take in response.
4. Resolution: We aim to finalise complaints within 90 days from the date of receipt.

Communication and Expectations:

- ◇ Regular Updates: We will provide regular updates on the progress of your complaint.
- ◇ Explanation for Delays: If there are any delays in resolving your complaint, we will explain the reasons for these delays.
- ◇ Notification for Further Information: If additional information is required from you, we will promptly notify you.
- ◇ Timely Updates About Changes: We will inform you about any changes to the expected timeframe or process as soon as possible.

Contact Details:

If you have any questions about our complaints handling process or need to make a complaint, please contact us at:

Email: [support@seechangepsychology.com.au](mailto:support@seechangepsychology.com.au)

Post: SeeChange Psychology, 125 Bentons Rd, Mornington VIC 3931

Phone: 03 9118 8291

We are committed to addressing any concerns promptly and effectively.

### Your Rights:

If you feel your complaint has not been adequately addressed, you have the right to contact the relevant authority in your state or country. In Victoria, you can contact:

- ◇ Health Complaints Commissioner

Role: Handles complaints about private mental health and wellbeing services, providers and practitioners registered with it, such as doctors, and psychologists.

Website: [hcc.vic.gov.au](http://hcc.vic.gov.au)

Contact: Call 1300 582 113 or use the contact form on their website.

You may also reach out to the

- ◇ Australian Health Practitioner Regulation Agency (AHPRA) if your complaint involves a registered health practitioner:

Role: Regulates health practitioners to ensure they meet professional standards.

Website: [ahpra.gov.au](http://ahpra.gov.au)

Contact: Call 1300 419 495 or use the online contact form on their website.

### Storage and security

We are committed to ensuring that the personal information we collect is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures, to safeguard and secure personal and sensitive information and protect it from misuse, interference, loss and unauthorised access, modification, and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

### Cookies and web beacons

From time-to-time cookies may be used on our online services. Cookies are text files placed in your computer's browser to store your preferences. Cookies, do not tell us your email address or other personally identifiable information. However, Google and Facebook, use cookies to target advertisements that will appear on your social media and online media feeds. Your personal information, provided to our online services may be linked to the data stored in the cookie.

Cookies can be blocked by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, you may not be able to access all or parts of our online services if you block all cookies (including essential cookies).

From time-to-time web beacons may be used on our online services. Web beacons (or Clear GIFs) monitor a visitor's behaviour and collect data about web page viewing, such as counting the users who visit a web page.

From time-to-time we may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)

### **Links to other websites**

Our services may contain links to other websites. We do not have any control over those websites, and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

### **Amendments**

This Privacy Policy may change from time to time.

Our amended Privacy Policy will be updated on our website. Check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact our Support Team at: SeeChange Psychology  
Email: [support@seechangepsychology.com.au](mailto:support@seechangepsychology.com.au)

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