

## Privacy Policy

### Overview

Evergreen Therapeutic Service Pty Ltd (ABN: 19 674 125 618) is committed to complying with the [Privacy Act 1988](#), the Australian Privacy Principles under that Act - <http://www.comlaw.gov.au/Series/C2012A00197>, and the privacy provisions of all applicable legislation, including those that operate in the Australian Capital Territory.

This Privacy Policy covers all personal information we hold, including sensitive information such as health information. This also includes information we have collected from you or third parties in person or by videoconference, over the phone, via email, through our customer portal, and over the internet.

### Collecting information - types of information we collect, how we collect it, and why we collect it

#### *Types of personal information we collect*

Personal information is any information or an opinion about an individual that is identifiable or reasonably identifiable. Personal information can include one piece of information, such as your name, or a dataset of information which together can result in you being identified.

When we collect personal information from you, we will ensure that we do so fairly and explain to you why we are collecting the information and how we plan to use it. We will only collect information that is necessary for one or more of our functions or activities. The type of personal information we collect about you depends on the circumstances in which the information is collected. Typically, the types of personal information we may collect can include but is not limited to your:

- name;
- address;
- email address;
- phone numbers;
- health information;
- date of birth;
- billing and payment details, such as your credit card number or bank account details;
- Medicare or Centrelink details; and
- private health or other insurance details.

Health information is 'sensitive information' - see below for further details. We may also receive health information about you from other health service providers, where you have consented to us collecting that from those third-party providers.

If you apply for a job or other role with us or enter into a contract for the provision of services with us, we may collect information relevant to your engagement with us including qualifications, length of engagement, resume, current and former employment details, as well as details from third parties such as recruitment agencies, referees, government bodies (for example: police checks, if required), and academic and professional bodies (for example: to validate details and currency of qualifications)

### *Sensitive information*

Sensitive information is a subset of personal information. Sensitive information includes but is not limited to:

- racial or ethnic origin;
- political opinions or ideologies including membership of any political association;
- religious beliefs or ideologies or philosophical beliefs;
- membership of professional or trade associations or unions;
- sexual orientation or practices;
- criminal record;
- health information; or
- genetic information, biometric information, or biometric templates.

If we collect sensitive information, we will treat it with the utmost security and confidentiality. Sensitive information will be used by us only:

- for the primary purpose for which it was obtained;
- for a secondary purpose that is directly related to the primary purpose;
- with your consent; or
- where required or authorised by law.

In addition to the types of personal information identified above, we may collect personal information as otherwise permitted or required by law. Where you choose not to provide requested information, we will advise you of what consequences this non-disclosure may have. For example, withholding certain information may limit our ability to provide relevant counselling or other services to you.

### *How we collect your personal information*

Some of the common ways in which we may collect personal information includes but is not limited to:

- if you are a client, during client on-boarding (for example: via registration forms), and during treatment sessions;
- when you make an enquiry or order in relation to products or services, including through our website or via telephone;
- from correspondence (whether in writing or electronically), or when you contact us via telephone, email, social media platforms, or other means;
- in administering and performing any contracts with service providers;
- when you apply for a role with us; and
- if you attend any of our premises, we may record certain contact details so that we can comply with applicable laws, and we may also record your image and/or voice if we have surveillance systems operating at those premises.

Where it is reasonably practical to do so, we will collect your personal information directly from you. However, in certain cases, we may collect personal information from publicly available sources and third parties, such as:

- if you are a client, from referrals or reports from other health professionals;
- reports from third party providers or those that are publicly available; and
- if you are applying for employment or any other position with us, from referees, government bodies (for example: police checks, if required), academic and professional bodies (for example: to validate details and currency of qualifications).

#### *Our purposes for handling your personal information*

The purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it. Whenever practical, we endeavour to advise you of the purpose for which your personal information is collected, how we intend to use that information, and to whom we intend to disclose it at the time we collect your personal information.

In general, we collect, use, and disclose your personal information so that we can provide our services to you and for purposes connected with our business operations and services. Some of the specific purposes for which we collect, hold, use, and disclose personal information are as follows:

- if you are a client, to provide you with our services;
- if you are (or represent) a supplier, to receive goods or services from you;
- to consider you for a job (whether as an employee or contractor) or other relationships with us;
- to comply with our legal and regulatory obligations;
- to protect the security, health and safety of our premises, facilities, personnel, and visitors;

- to address any issues or complaints that we or you have regarding our relationship; and
- to contact you regarding the above, including via SMS and email, by mail, by phone, or in any other lawful manner.

We may also use or disclose your personal information, including sensitive information for other purposes to which you have consented and as otherwise authorised, permitted, or required by law.

#### Disclosing information

Your personal information may be disclosed to third parties in connection with the purposes for which we collected your personal information, as described above, and in any privacy collection notices we provide to you. This may include disclosing your personal information to the following types of third parties:

- our suppliers, contractors, and organisations that provide us with technical and support services, or who manage some of our business functions;
- our related entities (who may use and disclose the information in the same manner we can);
- our accountants, insurers, lawyers, auditors, and other professional advisers; and
- any third parties to whom you have directed or permitted us to disclose your personal information (for example: if you are a client, to your treating doctor and other health professionals, or to an emergency contact).

We may also disclose your personal information in accordance with any consent you give or where disclosure is authorised, compelled or permitted by law. We may also use or disclose personal information in the circumstance where it is impracticable or unreasonable to obtain your consent, such as where there is actual or potential consequences associated with a serious threat whether it be to yourself or a third party, for example, where the urgency of a situation and level of threatened harm may require collection, use, and disclosure of personal information before it is possible to seek consent.

#### Overseas transfers

In the ordinary course of our business, we do not generally disclose your personal information to overseas recipients.

#### Accessing and correcting your personal information

You may contact us (see 'Contact details' section below) to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. We will respond to all requests for access to or correction of personal information within a reasonable time.

On the rare occasions when we refuse access (which we will only do in accordance with applicable laws), we will provide you with a written notice stating our reasons for refusing access. In addition, we are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your personal information at our discretion, but not before notifying you of such administrative fees. To protect your personal information, we may require identification from you before releasing the requested information.

We will take all reasonable steps to ensure that the data we collect, use, or disclose is accurate, complete, and up to date, and has been obtained directly from you or other reputable sources. If you find that the information we have is not up to date, for example: if you have moved address or have a new telephone number or email address, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

#### Storage and security

We will hold personal information as either secure physical records, electronically on our computer systems including our client portal, in cloud storage, and in some cases, on third-party servers. Our goal is to protect the personal information collected by us. We take all reasonable steps to keep your personal information secure, safe, and protected from misuse, interference, loss, or unauthorised access.

When your personal information is no longer needed for the purpose for which it was obtained and is not required to be kept by law, we will take reasonable steps to destroy or permanently de-identify it. We may need to retain records containing personal information to comply with record-keeping obligations, and for other legitimate business purposes (such as quality assurance).

#### Availability and review of Policy

We will make our Privacy Policy available upon request, as well as providing it on our website. This Policy will be reviewed from time to time, and any amendments will be incorporated into the updated version.

#### Complaints

If you have any questions, concerns, or complaints about this Privacy Policy, or how we handle your personal information, including if you believe we have breached the Australian Privacy Principles, please contact us (see 'Contact details' section below). When contacting us, please provide as much detail as possible in relation to your question, concern, or complaint.

We take all complaints seriously and will respond to your complaint in accordance with any applicable timeframes imposed by law, and otherwise within a reasonable period. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner

GPO Box 5288, Sydney NSW 2001

Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

<https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>

Our contact details are as follows:

Evergreen Therapeutic Services

[evergreentherapy@outlook.com.au](mailto:evergreentherapy@outlook.com.au)

Date of Privacy Policy: 1 February 2024