
PRIVACY POLICY

Palm Psychology Pty Ltd ABN 56 675 102 628 is committed to protecting your privacy. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including when you access our website, use our online contact form, contact by phone, email, or SMS, complete a questionnaire we provide to you, visit our practice or participate in telehealth.

We aim to comply with the Australian Privacy Principles contained in The Privacy Act 1988 (Cth) and General Data Protection Regulations (GDPR) to ensure that your information is protected.

1. Contact Details

Our contact details are:

ABN 56 675 102 628

admin@palmpsychology.com.au

2. Personal Information – Type, purpose and legal grounds

- 2.1. We may collect personal information about you for the purpose of providing our Services to you. We may collect this information directly from you or from a third party such as your referring doctor, or from a family member, partner or other support person but only with your consent or if required or authorised by law.
- 2.2. This may include personal information, sensitive information and health information. We store personal information in paper and/or electronic formats.

Personal information: information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

Sensitive information: is a sub-set of personal information that is given a higher level of protection. 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 or practices, criminal records, health information or biometric information.

Health information: is a type of sensitive information and includes any personal information that is collected while providing you a health service. For example, any details you share with us in a consultation about your medical history or mental health will be health information.

2.3. The types of personal information we may collect about you

2.3.1. When you contact us:

- name;
- contact details, including email address, street address, telephone number; and
- any other personal information requested by us and/or provided by you or a third party.

2.3.2. When you register with us as a client (including administrative paperwork):

- name;
- contact details, including email address, street address, telephone number;
- date of birth;
- Medicare number (if you are referred to us under a mental health plan);
- referring doctor;
- emergency contact name and telephone number;
- our correspondence with you or with other health professionals about you; and
- any other personal information requested by us and/or provided by you or a third party.

2.3.3. When you visit our website:

- 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 through the use of 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; and
- additional personal information that you provide to us, directly or indirectly, through your use of our Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information.

2.4. Why we collect, hold and disclose personal information

2.4.1. **Personal information:** We may collect, hold, use and disclose personal information for the following purposes:

- book an appointment via email or over the phone;
- contact and communicate with you about your appointment;
- enable referring doctors to refer you to us and/or book an appointment for you;
- register you as a client;
- check you in at our practice;
- provide our services;
- internal record keeping;
- administrative purposes including invoicing and billing purposes; and
- comply with our legal obligations and resolve any disputes that we may have.

2.4.2. **Sensitive information:** We require your explicit consent for processing sensitive data; therefore, when you submit your details, we will send you a further communication asking for you to confirm your consent to this processing. We only collect, hold, use and disclose sensitive information for the following purposes:

- to provide a written report to another agency or professional, e.g. a general practitioner or a lawyer;
- to discuss the material with another person, e.g. a parent, employer, health provider, or third party funder;
- to disclose the information in another way; or
- to disclose to another professional or agency (e.g. your general practitioner or Medicare);
- secondary purposes that are directly related to the primary purpose for which it was collected, including disclosure to the below listed third parties as reasonably necessary to provide our Services to you;
- to refer you to medical or health service providers, to contact emergency services, or to speak with your family, partner or support person where we reasonably believe there is a serious risk to the life, health or safety of you or another person and it is impracticable for us to obtain your consent; and
- if otherwise required or authorised by law.

2.5. Use of Personal Information

2.5.1. We only use your data for the purpose it was collected for or reasonably compatible purposes if necessary. If we need to use your details for an unrelated new purpose, we will explain the legal grounds for processing.

2.5.2. We may process your personal information without your knowledge or consent where this is required or permitted by law.

3. How your personal information is collected

3.1. Cookies

- 3.1.1. We may automatically collect certain data from you as you use our website by using cookies and similar technologies.
- 3.1.2. A "cookie" is a piece of information that is stored on your computer's hard drive and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.
- 3.1.3. Cookies are used by nearly all websites and do not harm your system.

3.2. How do we use cookies?

3.2.1. We use cookies to track your use of our website. This enables us to understand how you use the Site and track any patterns regarding how you are using our website. This helps us develop and improve our website and products and/or services in response to what you might need or want.

3.3. Google Analytics

3.3.1. We may have enabled Google Analytics Advertising Features including Remarketing Features, Advertising Reporting Features, Demographics and Interest Reports, Store Visits, Google Display Network Impression reporting. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together.

3.3.2. You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

4. Disclosures of Your Personal Data

4.1. We may disclose personal information to:

- 4.1.1. third party service providers for the purpose of enabling them to provide their services to us, including (without limitation) our employees, contractors and/or related entities;
- 4.1.2. our existing or potential agents or business partners;
- 4.1.3. anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- 4.1.4. courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- 4.1.5. courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- 4.1.6. third parties to collect and process data, such as IT service providers, data storage, web-hosting and server providers, email marketing providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators, Google Analytics (To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time), Facebook Pixel or other relevant analytics businesses; and
- 4.1.7. any other third parties as required or permitted by law, such as where we receive a subpoena.

5. Overseas disclosure

5.1. We may store personal information overseas. Where we disclose your personal information to the third parties listed above, these third parties may also store, transfer or access personal information outside of Australia.

5.2. Unless we seek and receive your consent to an overseas disclosure of your personal information, we will only disclose your personal information to countries with laws which protect your personal information in a way which is substantially similar to the Australian Privacy Principles and/or we will take such steps as are reasonable in the circumstances to require that overseas recipients protect your personal information in accordance with the Australian Privacy Principles.

6. Your rights and controlling your personal information

- 6.1. Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, 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 our ability to provide our Services to you and your use of our Services.
- 6.2. 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.
- 6.3. Anonymity:** Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.
- 6.4. Access:** You may request access to the personal information that we hold about you. An administrative fee is payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.
- 6.5. Correction:** If you believe that any 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, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.
- 6.6. Complaints:** If you wish to make a complaint, please contact us using the details above and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you also have the right to contact the Office of the Australian Information Commissioner.

7. Storage and security

- 7.1.** We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.
- 7.2.** These procedures include:
- securing any personal information we hold in an electronic format behind password log ins (typically with multi factor authentication);
 - securing any personal information we hold in physical files in a locked cabinet;
 - encrypting data, using virus protection software, implementing firewalls; and
 - limiting internal access to the personal information we hold about you based on a need-to-know basis.
- 7.3.** While we are committed to security, 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.

8. Data Security

- 8.1.** We strive to ensure the security, integrity, and privacy of personal information submitted to our website, and we periodically update our security measures in light of current technologies.
- 8.2.** We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- 8.3.** You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

8.4. We have procedures in place to deal with any suspected personal data breach. We will notify you and any applicable regulator of a breach if we are legally required to.

9. Data Retention

- 9.1. Your personal information is only kept while it is required for the purpose for which it was collected or as required by law. It will then be securely destroyed or de-identified.
- 9.2. Health records are kept for a minimum of 7 years since the last time you we provided you a health service. Where we provide services to children, we keep your health record at a minimum until you reach the age of 25. When we destroy your health record, we keep a written note of your name, the date we destroyed it, and the time period the record covered.

10. Your Legal Rights

- 10.1. Under data protection laws, you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, object to processing, portability of data, and (where the lawful ground of processing is consent) to withdraw consent.
- 10.2. If you wish to exercise any of the rights set out above, please email us at admin@palmpsychology.com.au
- 10.3. To respond to any request, we will require the following information:
 - your name and address; and
 - your contact telephone numbers
- 10.4. There is no fee chargeable to access your personal data; however, we may charge a fee if your request is unfounded, repetitive or excessive, or refuse to comply with our request in these circumstances.
- 10.5. As a security measure to ensure your data is not disclosed to any person who has no right to receive it, we may request further information from you.
- 10.6. We try to respond to all legitimate requests within 30 days unless the request is complex or where there are multiple requests. If our response is likely to exceed 30 days, you will be notified.
- 10.7. If you are not happy with any aspect of how we collect and use your data, please contact us first to attempt to resolve your issue immediately. You also have the right to complain to the Office of the Australian Privacy Commissioner (<https://www.oaic.gov.au>), the Australian supervisory authority for data protection issues.

11. Change in Privacy Policy

- 11.1. To ensure our privacy policy remains current, this policy is subject to change.
- 11.2. We may modify this policy at any time, at our sole discretion. All modifications will be effective immediately upon our posting of the modifications on this website. Therefore, please return periodically to review our privacy policy.
- 11.3. If you have any questions or concerns at any time about our Privacy Policy or the use of your personal information, please email admin@palmpsychology.com.au.