

## **DATA SECURITY**

### **We take data security seriously.**

1. We secure your personal information by:
  - a. Storing all digital personal data in encrypted form on Cliniko, a reputable provider of a cloud-based client management system used by many of the OT Practices around Australia
  - b. Using multi-factor authentication (requires a SMS code and password to access accounts) for all digital accounts, including email accounts;
  - c. OTHER STEPS TAKEN, SUCH AS:
    - i. Reminding staff in our weekly meeting of the key cyber security steps;
    - ii. Restricting access to participant's files to staff on a needs basis;
    - iii. Changing passwords for staff accounts as needed.
    - iv. Maintaining up-to-date confidentiality and information security guidelines which align with industry best practice recommendations
2. Please also read our Privacy Policy (below), which requires us to take all reasonable steps to protect your personal information from unauthorised access, misuse, loss, modification or disclosure.

## **PRIVACY POLICY**

**Our privacy terms are compliant with the Australian Privacy Principles set out in the *Privacy Act 1988 (Privacy Act)* as well as the *Spam Act 2003*.**

### **1. Policy Statement**

Country Therapy respects your privacy. We are committed to ensuring the privacy of your information and that our terms are

compliant with the Australian Privacy Principles as set out in the Privacy Act 1988 and the Spam Act 2003.

## **2. What personal information does Country Therapy collect and hold?**

- a. Personal information is information or an opinion (whether true or not) about an identified, or reasonably identifiable, individual.
- b. The types of personal information that we will collect will depend on the nature of your dealings with us. We collect personal information from nominees, participants, support workers, clients, prospective clients, and other stakeholders that we encounter in the ordinary course of supplying our services. This information is primarily collected to assist in the provision of our services but may also be collected for our use in marketing and related activities.
- c. This information is collected in a number of ways, such as via email, over the phone, in person, and when receiving documents from you.
- d. Note that while we seek to minimise the personal information we collect, if you do not provide us with the personal information we request, we may not be able to provide you with the services and other assistance you seek.
- e. Generally, we endeavour to collect personal information directly from the individuals concerned, including via telephone, email, hardcopy or online forms.
- f. However, if this is not practicable, we may collect personal information about individuals from third parties, including from publicly available sources. Such third parties may include an insurer, an employer, a family member and/or anyone you have / the participant has authorised to deal with us, and anyone seeking our services in relation to their dealings with you.
- g. If we do collect personal information from third parties, we will take reasonable steps to ensure that the individuals concerned are made aware of the collection of their information.
- h. All personal information that is collected, held, used and disclosed by us will be done so in accordance with this Privacy Policy.

- i. Unless it is needed for the purposes of supplying our service to you or the participant (together, herein referred to as '**You**'), Country Therapy will not ask for sensitive information about You, such as details of Your:
  - i. racial or ethnic origin;
  - ii. political affiliation;
  - iii. religious beliefs;
  - iv. sexual preferences;
  - v. criminal convictions; and
  - vi. health information.

### **3. Who does Country Therapy use and disclose personal information to?**

- a. We may collect personal information:
  - i. to provide our services and conduct our business; and
  - ii. to communicate new developments, including advertising new products or services that we offer.
- b. Your personal information may also be confidentially disclosed to other entities. Such entities generally include:
  - i. our third-party service providers for the purpose of enabling them to provide, manage or administer a service (such as our IT service providers, organisations providing secure storage and archiving services, and insurers)
  - ii. Your representatives, supports, and advisors, if You have provided consent for such disclosure;
  - iii. government bodies, regulators, law enforcement agencies and any other parties, where authorised or required by law; and
  - iv. any other entities You authorise at the time of collecting Your personal information or to whom we are legally required to disclose Your personal information.

- c. Country Therapy will only disclose personal information if required by law or permitted under the Privacy Act.
- d. Country Therapy will not sell, rent or trade personal information about You to or with third parties.
- e. Country Therapy is also bound by professional obligations of confidentiality, including in relation to personal information.
- f. Country Therapy's policy is only to use personal information collected for the purpose for which it was collected.

#### **4. Securing Your personal information**

- a. We will use all reasonable endeavours to keep Your personal information in a secure environment.
- b. We will take reasonable steps to protect personal information held from misuse, interference, loss and from unauthorised access, modification or disclosure – for example by:
  - i. We store passwords securely, have a no public wifi policy for the workforce, and manage passwords efficiently.
  - ii. Our business premises is secured via security cameras and have a access code
  - iii. We have IT security procedures including password protection, firewalls, intrusion detection and site monitoring; powered by Google Workforce
  - iv. mandatory confidentiality guidelines for all staff within the business
- c. You must also take reasonable care to protect Your personal information (for example, by protecting any usernames and passwords).
- d. You must immediately notify us as soon as possible if You become aware of any security breaches or if You believe that there has been unauthorized use or disclosure of Your personal information.

#### **5. Accessing Your personal information held by Country Therapy**

- a. You may access personal information we hold about You, subject to any legal restrictions or exemptions. If such

restrictions or exemptions exist, we will advise You of those reasons at the time of Your request. We may also require You to provide proof of Your identity before discussing any personal information.

- b. We take reasonable steps to ensure that the personal information we hold about You is accurate, complete and up-to-date. However, we also rely on You to advise us of any changes to Your personal information.
- c. Please contact us if there are any changes to Your personal information or if You believe the personal information we hold about You is not accurate, complete or up-to-date.
- d. While we do not charge You for a request for accessing Your personal information You should be aware that we do charge a reasonable fee if an extended amount of time is required to collate and prepare material for You, and /or if You wish to have Your files photocopied.

## **6. Junk mail or unsolicited email**

- a. You will only receive emails from us if:
  - i. You request information about our services when You choose to contact us; or
  - ii. It is otherwise relevant to the reasons for which we hold Your email address, where we are permitted to do so by law.

## **7. What do You need to do if You have a complaint?**

- a. If You wish to make a complaint about a breach of this Privacy Policy, the Australian Privacy Principles, privacy-related issues or the privacy laws of Your local jurisdiction, please contact our office.
- b. We may ask that You provide us with sufficient details in writing regarding Your complaint together with any supporting evidence.
- c. Country Therapy will investigate the issue and determine the steps (if any) that we will undertake to resolve Your complaint. We will contact You if we require any additional information

from You and will notify You in writing of the outcome of the investigation.

- d. If You are not satisfied with our determination, You can contact us to discuss Your concerns.

## **8. Contact us**

Should You have any queries relating to this Privacy Policy or wish to make a complaint, please contact us at:

Country Therapy, 1/18 Tuson Street, Ararat 3377

P: 0494-131-621

E: [reception@countrytherapy.com.au](mailto:reception@countrytherapy.com.au)