



Privacy Policy

1. POLICY STATEMENT

The Spark Therapy Services and its related entities (referred to in this document as **we, us** or **our**) recognise that your privacy is important and we are committed to protecting the personal information we collect. The Privacy Act 1988 (**Privacy Act**), Australian Privacy Principles, health records legislation and registered privacy codes govern the way in which we must manage your personal information. This privacy policy sets out how we collect, use, disclose and otherwise manage your personal information.

Under the Privacy Act, 'personal information' is defined as any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

'Sensitive information' is defined as information or an opinion (that is also personal information) about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record, health information, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

2. PURPOSE

This policy outlines The Spark's procedures regarding protecting the privacy of our participants and also how we comply with our legal obligations and legislation.

3. RESPONSIBILITIES

The Director is responsible for keeping up to date with the legislation regarding privacy and updating this policy. All staff are responsible for implementing this policy and procedure. All clients of The Spark are provided with this policy when they engage with our service.

4. PROCEDURE

Collection

Types of information collected

We may collect and hold personal information about you, that is information that can identify you, and is relevant to providing you with the services you are seeking. The kinds of information we typically collect

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include name, gender, address, phone number, email address, credit card details, place and type of business or other information that is relevant to providing you with the services you, or someone else you know, are seeking. We may also collect sensitive information about you, including information about your health, cultural and religious beliefs, with your consent.

Method of collection

Personal information will generally be collected directly from you through the use of any of our standard forms, over the internet, via email, in a face-to-face meeting or through a telephone conversation with you. We may also collect personal information about you from third parties acting on your behalf. For example, other allied health professionals, educators or NDIS staff. There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

Purpose of collection

The personal information that we collect and hold about you, will depend on your interaction with us. Generally, we collect, use and hold your personal information for the purposes of:

- assessing you/ your child's needs and providing services and community allied health services to you or someone else you know;
- responding to your queries and managing bookings;
- providing you with information about other services that may be of interest to you;
- providing you with information relevant to your area of expertise or interest.
- facilitating our internal business operations, including the fulfilment of any legal requirements, invoicing.
- analysing our services and customer needs with a view to improving those services.
- for quality and training purpose.

Failure to provide information

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else, with the services you, or they, seek.

Internet users

If you access our website, we may collect additional personal information about you in the form of your IP address or domain name. Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and any linked websites are not subject to our privacy policies and procedures.

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about

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you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what page you view so that we may serve you more effectively.

The Spark is not responsible for the content or privacy practices employed by websites that are linked from our website.

Use and disclosure

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- your referrer or other healthcare professionals involved in your care, with your permission. This may include reports, service plan and goals, referrer letters and treatment summaries.
- Other members of you / your child's team that you have given written consent for information to be provided to. For example, educators, support workers. This may include reports, service plan and goals, referrer letters and treatment summaries.
- Trusted third party service providers who assist us in operating our business (for example, including technology service providers),
- The Spark may also use or disclose personal and health information where necessary for activities such as
 - ➔ quality assurance processes, accreditation, audits, risk and claims management
 - ➔ Feedback and surveys
 - ➔ Invoicing and billing
 - ➔ To liaise with external agencies, such as NDIA, education department, private health funds, Medicare, TAC or The Department of Veteran's Affairs.
 - ➔ Employee training
 - ➔ Text and email reminders regarding appointments and follow up care.
 - ➔ The purpose of making calendar appointments in online booking systems.
- Other uses with consent, such as marketing mail list, or research. Please note, however, that unless The Spark gains consent for this purpose, information will not to be used in this way

In some circumstances, the law may permit or require us to use or disclose personal information for other purposes (for instance, where you would reasonably expect us to and the purpose is related to the purpose of collection). Except as otherwise permitted by law, we only disclose sensitive information about you if we have your consent.

We retain information as per legislative requirements.

Security

We store your personal information in different ways, including in paper and electronic form. The security of your personal information is important to us. We take reasonable measures, including electronic and physical security measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, interference, modification or disclosure. We have an Information

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Management and Digital Security Policy guided by advice from the Australian Cyber Security Centre, to ensure we follow best practice regarding digital security.

Mandatory breach reporting

We aim to ensure that your personal information is handled in strict compliance with the Commonwealth Privacy Act 1988 and we will take all reasonable steps to mitigate the risk of a breach of privacy.

Where we believe that a breach of privacy may have occurred, we will take reasonable steps to manage the situation. We will comply with any applicable breach notification requirements of the Privacy Act, including the requirement to notify you and the Office of the Australian Information Commissioner.

Access and correction

You may request access to personal information we hold about you, by making a written request. We will respond to your request within a reasonable period. We may charge you a fee for processing your request (but not for making a request for access).

We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

If upon receiving access to your personal information, or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint.

Complaints and feedback

If you wish to make a complaint about a breach of the Privacy Act, Australian Privacy Principles, health records legislation or a privacy code that applies to us, please contact us as set out below and we will take reasonable steps to investigate the complaint and respond to you. If you are not happy with our response, you may complain directly to the Australian Privacy Commissioner.

If you have any queries or concerns about our privacy policy or the way we handle your personal information, please:

1. Contact our Director Tina Bruce at:
a: Unit 4, 329-347 Diamond Creek Road, Diamond Creek, 3089
e: tina@thesparkts.com.au
t: 0490 802 175
2. Complete the Feedback form on our website <https://www.thesparkts.com.au/feedback>

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3. Speak with your / your child's OT who will follow the complaints procedure.
4. Contact the NDIS Commission Feedback and Complaints team.

email: contactcentre@ndiscommission.gov.au

telephone: 1800 035 544

For more information about privacy in general, you can visit the Australian Privacy Commissioner's website:

<https://www.oaic.gov.au/>

5. FURTHER INFORMATION

For further information on this procedure, contact Tina Bruce Director The Spark Therapy Services

tina@thesparkts.com.au 0431273352

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