

## Develop Therapy Services

### Privacy Policy

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This Privacy Policy (Policy) sets out A.M. Copley & S.R. Murchland trading as Develop Occupational Therapy ABN 68 696 765 592 (“**Develop**”, “**we**” or “**us**”) policies relating to management of your personal information.

The privacy of your personal information is important to Develop. Develop is committed to respecting your right to privacy and protecting the personal information you provide to Develop. These policies are based on our obligations under the *Privacy Act 1988* (Cth) (“**Act**”) (including the Australian Privacy Principles (“**APPs**”).

By voluntarily supplying us with your personal information, you are agreeing to be bound by this Policy.

This Policy is periodically reviewed, and was last updated on 23 February 2016. Any amendments to this Policy will be notified to you by posting an updated version on our website, [www.developot.com.au](http://www.developot.com.au).

Please note that Develop’s website may contain links to other websites. When a user has clicked on a link to another site, they leave the Develop site and are no longer protected by this Policy.

#### Collection of personal information

Develop collects information in an open manner, including informing individuals that information is being collected, why it is being collected, how it will be used, who else might see it and any consequences that may apply if the information is not provided.

If Develop receives any personal information which it has not solicited from an individual it will take such steps as are necessary to lawfully destroy or de-identify the information if Develop cannot establish that it could otherwise have lawfully obtained the information.

Develop may collect and/or hold the following kinds of personal information:

- contact information such as name, postal address, private address, email address, telephone numbers and date of birth;
- financial details, including bank account details, tax file number and credit card details;
- your next of kin details;
- your health information, as disclosed to us; and
- any other personal or private information voluntarily provided by you.

For the purposes of our obligations under the Act the terms of this Policy, health information includes:

- information or an opinion about:
  - your health or disability;
  - your expressed wishes about future provision of health services to you;
  - health services provided, or to be provided, to you; and
- other personal information collected to provide, or in providing our health, services to you.

Develop’s website collects the following information from users: your server address;

- your top level domain name (for example, .com, .gov, .au etc);
- the date and time of your visit to the site;
- the pages you accessed;
- the previous site you have visited; and
- the type of browser you are using.

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#### Purposes for collection

Personal information is collected, held, used and disclosed by Develop for the following purposes:

- as a necessary part of providing our services to you;
- to respond to queries about our services;
- to provide further information about Develop, the services we are providing to you and any other information you may require from time to time;
- to market or promote our services directly to you (unless as requested otherwise);
- to verify an individual's identity;
- to resolve a complaint;
- to process payments; and
- other purpose related to any of the above.

#### Means of collection and holding of personal information

Your personal information may be collected in a number of ways, including:

- directly by our staff when you seek, or enquire about, our goods or services;
- when you apply to be employed or engaged by us; or
- when you apply to provide services to us.

Develop will only collect personal information by lawful means where collection is for a lawful purpose which is directly related to one of its activities and is reasonably necessary for that purpose.

Develop will only collect sensitive, including health information, about an individual if the individual has consented to such collection of its sensitive or health information and if the information is reasonably necessary for us to provide our services to you.

You need not provide all the information requested by Develop, but this may prevent us from providing some or all of our goods or services to you.

Develop will collect information directly from the individual concerned unless it is unreasonable or impracticable to do so. If the information collected by Develop is in respect of a person under the age of 18 years or who is otherwise legally incapacitated, the information must be provided by a parent or guardian on behalf of that person. However, there may be circumstances where Develop will obtain information from other sources e.g. references for volunteer and employment purposes.

Our website systems use various technologies, including cookies, to collect information from website users. Cookies are small files that are stored on a user's computer by the web server through the user's browser. The actual contents of the cookie information can be retrieved by the same web server to identify the computer and subsequently to customise, monitor, or regulate the use of the site based on information stored in the cookie or host server. One of the ways we use cookies is to identify computers that are being used to make visits to our website. Please note that if you enter our website from another website, the other website may use their own cookies to learn of your visit to our website. We have no control over other websites use of cookies to collect information. If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the services on our website.

Your personal information may be stored as physical files in a secured area, on our electronic data base system and on computers with appropriate back up and security systems. Any personal information which is held on our computer systems is protected by safeguards including physical, technical (including firewalls) and procedural methods.

Develop is committed to keeping secure the personal information you provide to us and we will take all reasonable precaution to protect your personally identifiable information from loss, misuse, interference, unauthorised access or alteration.

We aim to achieve this through:

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- imposing confidentiality requirements on our employees and volunteers;
- implementing security measures to govern access to our systems;
- only providing access to personal information once proper identification has been given; and
- implementing website protection measures.

Unless expressly stated otherwise at the time of collecting the information or as required by law, we will destroy any information provided to us once the relevant activity, program or purpose for which it was collected has been completed.

#### Quality of information

Our goal is to ensure that your personal information is accurate, relevant, complete and up-to-date. To assist us with this, please contact us if any of the details you have provided to us change. Further, if you believe that the information we hold about you is not accurate, complete or up-to-date, please contact us at the contact details provided below and we will use all reasonable efforts to correct the information in accordance with this Policy.

#### Disclosure and use of personal information

Develop has a duty to keep personal information confidential. Our duty of confidentiality applies except where we have consent to disclose information, the disclosure is permitted under the APPs or is compelled by law.

Develop will only use your information for the purposes for which it was collected (“**primary purposes**”) unless:

- use of the information is directly related to the primary purpose and this use would be reasonably expected by you;
- use of the personal information is necessary to deal with a serious and imminent threat to any individual’s life or health and it is unreasonable or impracticable to obtain your consent;
- use of the health information is necessary to deal with a serious and imminent threat to any individual’s life, health or safety, or is necessary to lessen or prevent a serious threat to public health or public safety and it is unreasonable or impracticable to obtain your consent; or
- otherwise with your consent.

Generally, Develop will only disclose personal information to a third party on the request of an individual, where it receives a signed authorisation by the individual (or its parent or guardian) to be released for a specific purpose. However, Develop may disclose your information to necessary third parties, who assist us to provide, manage and administer our services. In which case, your information will be dealt with in accordance with that entity’s privacy policy.

We do not disclose your personal information to overseas recipients.

#### Access to information and seeking correction

You can contact us at any time to request access to your information or for your information to be corrected or updated. Please direct your request to the Privacy Officer via the details provided in this Policy.

Develop will take appropriate steps to verify your identity (or verify that you act as a legal guardian or authorised agent of the individual concerned) before granting a request to access your information.

We will respond to your request for access to your information within a reasonable time after you make the request and if access is granted, access will be provided within 30 days from your request. Develop will, on request, provide you with access to your information or update or correct your information, unless the Act provides an exception to us granting your request, including if:

- giving access would be unlawful;
- we are required or authorised by law or a court/tribunal order to deny access; or
- giving access is likely to prejudice one or more enforcement related activities conducted by an enforcement body.

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Where your request for access is accepted, we will provide you with access to your information in a manner, as requested by you, providing it is reasonable to do so. We may charge an administrative fee for our costs of retrieving and supplying the information to you.

Your request for correction will be dealt with within 30 days, or such longer period as agreed by you. If we deny your request, we will provide you with a written notice detailing reasons for the refusal and the process for making a complaint about the refusal to grant your request.

Upon accepting a request for correction of your information, we will take all steps that are reasonable in the circumstances, having regard to the purpose for which your information is held, to correct your information.

#### Dealing with us anonymously

Where lawful and practicable to do so, you can deal with us anonymously or using a pseudonym. You can deal with Develop anonymously or using a pseudonym when making a general enquiry about the services that we can offer to you.

You may request at the start of any telephone call with us, in relation to a general enquiry, to remain anonymous (or you may use a pseudonym).

#### Complaints

If you believe that Develop has breached a term of this Policy or the APPs you may submit a written complaint. The written complaint can be emailed or posted to us using the contact details set out below. You must include contact details for us to contact you regarding your complaint.

Our Privacy Officer will consider your complaint and respond as soon as reasonably possible, but not more than 30 days from receiving the complaint.

If you are unsatisfied with the outcome of your complaint you may ask the Director to be referred to a higher authority, such as the AHPRA. If you still remain unsatisfied with the outcome, you may refer your complaint to the Office of the Australian Information Commissioner to be resolved.

#### Contact Us

If you wish to:

- gain access to your personal information;
- make a complaint about a breach of your privacy;
- contact us with a query about how your personal information is collected or used;
- contact us regarding any other matter concerning this Policy,

you can speak directly with our staff who will do their best to try to resolve your issue as simply as possible. Alternatively, you can write to us or send us an email so that our Director can consider the matter. We will respond to you as soon as reasonably possible.

Our contact details are as follows:

*Phone:* 8352 1382  
*Director contact:* Alison Copley Sonya Murchland  
*Postal address:* PO Box 4036, SEATON SA 5023

For more information on privacy see the Office of the Australian Information Commissioner's website at: <http://www.oaic.gov>.