



# Embark Physio Privacy Policy

## Our commitment to your privacy

We are committed to handling personal information about you, including health information about you, in accordance with the requirements of the Commonwealth Privacy Act 1988.

In this Policy, we explain:

- what kind of information we collect and hold about you
- how and why we collect it
- what we do with that information and who we share it with (and when)
- your right to seek access to, and if required correction of, the records we hold about you
- your right to make a privacy complaint, to us and others
- whether we are likely to disclose information about you to overseas recipients.

## What kind of personal information do we collect about you?

We only collect personal information that is necessary for what we do. The type of information we may collect from you includes (but is not limited) to the following:

- your full name, address, date of birth, email and contact details
- information about your family or relatives
- information about other therapists or health professionals involved in your care
- information and / or reports from other therapists or health professionals
- any relevant paying or billing information, Medicare number, NDIS number, health fund, or other government identifiers (including but not limited to bank account details, credit card details, billing address / email)
- Information about your disability / condition, medical history, medications, activities you undertake, and other pertinent information that is necessary to provide care to you.
- For video consultations, your IP address, profile and contact details on the selected online portal, and any other personal information that may be collected or incidentally supplied by you by virtue of the video consultation
- Where we interact with you via social media and other marketing activities: your activity including “likes”, comments posted, your opinions or feedback and any other information pertaining to your social media activities which concern, or relate, to us

Where we collect your health information, or certain other information (such as racial or ethnic origin, or sexual preference), that information is known as ‘sensitive information’. Sensitive information is given a higher level of protection than other personal information.

## How do we collect your personal information?

We will generally collect personal information about you in these ways:

- directly from you when you give us your details (e.g., face-to-face, over the phone, video consultation, client registration form, questionnaires / surveys)
- from a person responsible for you
- from other health services that support you
- from a third party where we are permitted by law to do that (e.g. government agencies – Medicare, NDIS; from your private health insurer; from solicitors, lawyers, workers compensation companies).

Sensitive information will only be collected with your consent.

## Why do we collect and use information about you?

We collect information that is necessary to provide our services to you and to communicate with you and others involved in your care in relation to those services.

Some of the reasons we collect and use personal information are to:

- provide our services to you
- understand what support you need
- provide reports to government agencies and private health funds
- administrative and billing purposes
- marketing purposes

Sensitive information will only be used for the primary purpose for which it was obtained (which will usually be providing our services to you), or for another purpose which is directly related to the primary purpose and where it would be within your reasonable expectations for us to use it in that way. We will not use sensitive information for marketing purposes.

## When and why might we share information about you with others?

We may disclose information about you to others outside of our Embark Physio as permitted or required under law. This will include situations where we disclose information about you in order:

- to comply with our legal obligations (eg. mandatory reporting under legislation, responding to a court order or subpoena)
- to consult with other health professionals involved in your healthcare
- to claim on insurance
- to communicate with your health fund, with government and other regulatory bodies such as Medicare, NDIS

- to help us manage our accounts and administrative services (e.g. billing or debt recovery, arrangements with health funds, pursuing unpaid accounts etc.)
- to lessen or prevent a serious threat to a patient's life, health or safety or a serious threat to public health or safety
- to help in locating a missing person
- to prepare the defence of anticipated or existing legal proceedings
- to discharge notification obligations to liability insurers.

We will only disclose your sensitive information to others where:

- You have expressly consented to us doing so (for example, corresponding with other health professionals)
- It is required by law
- It is otherwise lawful and necessary for us to do so (for example, in an emergency to prevent a serious threat to a person's life, health or safety)

## Your right to seek access to and to seek correction of the information we hold about you

You have the right to seek access to and correction of the personal information we hold about you.

We will normally respond to your request within 30 days. To make the request, you should contact Embark Physio at [info@embarkphysio.com.au](mailto:info@embarkphysio.com.au)

If you think that the information we hold about you is not correct, let us know in writing. We will take reasonable steps to correct your personal information where the information is not accurate or up-to-date. From time to time, we may also ask you to verify that the information we hold about you is correct and current. And please notify us if and when your contact details change.

## Security: how we hold your personal information

We take reasonable steps to protect the information we hold about you. These are designed to prevent unauthorised access, modification or disclosure and to prevent misuse and loss. This includes:

- holding information in secure cloud storage
- providing team member with training or induction etc. about confidentiality and (in particular) security issues
- access to information restricted on a 'need to know' basis
- team members to sign a confidentiality form
- strong password protections when accessing the information on a computer.
- electronic data and written information will be destroyed after legal obligations to retain it have expired.

## Disclosing information about you overseas

Embark Physio strives to provide the best possible service to our clients. We are members of a professional development program and use services outside of Australia to ensure we deliver on this goal. We may disclose your personal information to the following overseas recipients:

- Your personal information (but not sensitive information) may be transferred and stored at servers outside of Australia through market leading services such as Xero and Microsoft OneDrive.
- any health professional who helps us to provide our physiotherapy services to you (e.g. health professionals who treated you when you were overseas) or anyone else you authorise us to contact
- By submitting your personal information to Embark Physio, you expressly agree and consent to the disclosure, transfer, storing or processing of your personal information (but not your sensitive information) outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to personal information.
- The Privacy Act requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your personal information outside of Australia do not breach the privacy principles contained within the Privacy Act. By providing your consent, under the Privacy Act, we are not required to take such steps as may be reasonable in the circumstances.

## If you have a privacy-related concern about us

If you have concerns about the way we have handled your privacy, let us know. You should do that in writing. We will then try to respond to you within 30 days.

If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commission, whose contact details are:

Phone: 1300 363 992

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

Post: GPO Box 5218 Sydney New South Wales 2001

Website: <https://www.oaic.gov.au/privacy/privacy-complaints/>

## Updating this policy

We will make our privacy policy available upon request and will provide a link to this policy on our website.

This policy will be reviewed from time to time and any amendments will be incorporated into the updated policy.

## How to contact us

If you have any questions or comments about a privacy-related issue, please contact us:

Phone: 0450 594 416

Email: [Info@embarkphysio.com.au](mailto:Info@embarkphysio.com.au)

Post: PO Box 3124 Myaree, WA 6154