



This policy outlines the ways in which **THOUGHTFUL CONNECTIONS PTY LTD ABN 82674747678** manages, collects, uses and may disclose our clients' personal information. We take privacy seriously and are committed to complying with the *Australian Privacy Principles* in the *Privacy Act 1988 (Cth)* and the privacy provisions of all applicable legislation.

## Why we collect personal information

The sharing of personal information by a client to **THOUGHTFUL CONNECTIONS PTY LTD** assists us to assess and support the client in processing their identified concerns. Personal information is retained to enable us to provide a relevant and informed service.

## Consequence of not providing personal information

If you do not wish for your personal information to be collected in a way anticipated by this Privacy Policy, Thoughtful Connections Pty Ltd may not be able to provide you with the service desired. Within our practice and due to our duty of care a client cannot be anonymous, and a name as listed on legal ID is required. You may request to remain anonymous or to use a pseudonym in session, unless it is impracticable for the practitioner or if the practitioner is required or authorised by law to deal with identified individuals.

## Personal information

Client information, based on the Act, includes *Personal*, *Sensitive*, as well as *General* information.

**Personal information** is any information about an individual that can be used to identify them directly or indirectly, such as name, address, phone number, email address, and date of birth.

**Sensitive information** is a type of personal information which includes details, for example, about a person's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Thoughtful Connections Pty Ltd also collects **General information** collected as part of providing the therapeutic service including emails, chat records, and text messages between the client and the company.

Typically, the types of personal information we may collect can include (but is not limited to) your name, address, email address and phone numbers

If you are a client/patient, we may also collect details of your date of birth, billing and payment details, Medicare and insurer details, as well as health information about you so that we can perform our services. We may also receive health information about you from other health service providers, where you have consented to us collecting that from those third-party providers.

If you apply for a job or other role with us, we may collect information relevant to your engagement with us including qualifications, length of engagement, resume, current and former employment details, as well as details from third parties such as recruitment agencies, referees, government bodies (e.g. police checks, if required) and academic and professional bodies (e.g. to validate details and currency of qualifications).

All practitioners are ethically required to maintain some form of written clinical record of each session. By law, any clinical notes documented in session can only be viewed by your practitioner at Thoughtful Connections Pty Ltd.

When we collect personal information from you, we will ensure that we do so fairly and explain to you why we are collecting the information and how we plan to use it. We will only collect information that is necessary for one or more of our functions or activities. The type of personal information we collect about you depends on the circumstances in which the information is collected.

## How we collect personal information

Where it is reasonably practical to do so, we will collect your personal information directly from you. However, in certain cases, we may collect personal information from publicly available sources and third parties.

We collect personal information through a variety of means, including:

- information you share with us verbally



- from correspondence (whether in writing or electronically) or when you contact us via telephone, email, social media platforms or other means, including our online website or booking system and intake forms
- information provided by a legal guardian of a person under 18 years of age
- a referral from your GP or another treating practitioner or service
- notes written during your session, which are required by law and our ethical obligations, and to ensure the best continuation of your care
- in administering and performing any contracts with service providers
- if you are applying for employment or any other position with us, from referees, government bodies (e.g. police checks, if required), academic and professional bodies (e.g. to validate details and currency of qualifications).
- if you attend any of our premises, certain contact details may be recorded to comply with applicable laws, and we may also record your image and/or voice if we have surveillance systems operating at those premises.

## Use of personal information

In general, we collect, use and disclose your personal information so that we can provide our goods and services to you and for purposes connected with our business operations. Some of the specific purposes for which we collect, hold, use and disclose personal information are as follows:

- if you are a client/patient, to provide you with our services and products
- if you are (or represent) a supplier, to receive goods or services from you
- to consider you for a job (whether as an employee or contractor) or other relationships with us
- to comply with our legal and regulatory obligations
- to protect the security, health and safety of our premises, facilities, personnel and visitors
- to address any issues or complaints that we or you have regarding our relationship and
- to contact you regarding the above, including via SMS and email, by mail, by phone or in any other lawful manner.

We may also use or disclose your personal information for other purposes to which you have consented and as otherwise authorised, permitted or required by law.

## Storage of personal information

Our goal is to protect all personal information collected. We take all reasonable steps to keep your personal information secure, safe and protected from misuse, interference, loss, or unauthorised access. In order to do so, we store it in several ways all of which are secure and can only be accessed by approved individuals. The method of storage varies between types of information and includes both hard copies and digital versions (either on a secure server or offline).

When your personal information is no longer needed for the purpose for which it was obtained and is not required to be kept by law, we will take reasonable steps to destroy or permanently de-identify it. We may need to retain records containing personal information to comply with record-keeping obligations, and for other legitimate business purposes (such as quality assurance).

We do not retain any credit card or banking details once processing the payment is finalised. We also try not to retain unnecessary information, disposing of it securely from time to time depending on the type of information it is and our legal obligations.

If we become aware of a security breach we will promptly investigate and, where appropriate, take remedial action and notify the individual affected in accordance with the *Privacy Act. 4 Good Practice Guidelines: Privacy, intake and consent in private practice*.

## Disclosure of personal information

We will not disclose personal information about you to third parties without your consent. The exceptions to this clause are:

- if the information is subpoenaed by a court, or disclosure is otherwise required or authorised by law
- if failure to disclose the information would, in the reasonable belief of the Thoughtful Connections Pty Ltd practitioner, place a client or another person at serious risk to life, health or safety
- if the client's prior approval has been obtained:
  - to provide a written report to another agency or professional (such as a GP or a lawyer)



- to discuss the material with another person (such as a parent / employer / health provider / third-party funder)
- to disclose to another professional or agency (for example to your GP)
- to disclose the information in another way

and disclosure of your personal information to that third party is for a purpose which is directly related to the primary purpose for which your personal information was collected.

Some of the third parties to whom we disclose personal information in the course of online business may be located outside Australia. The countries in which such third-party recipients are located depend on the circumstances. We will not purposefully disclose any information to a recipient outside of Australia.

If unauthorised access, disclosure or loss of your personal information occurs, Thoughtful Connections Pty Ltd will activate its data breach plan and use all reasonable endeavours to minimize the risk of consequential serious harm.

### **Accessing personal information**

You may request access to personal information we hold about you. We may ask you to specify what information you require. Subject to exceptions in the *Privacy Act 1988*, we may discuss the contents with you and/or give you a copy.

We may refuse to provide access, if the Privacy Act allows us to do so. On the rare occasions when we refuse access (which we will only do in accordance with applicable laws), we will provide you with a written notice stating our reasons for refusing access.

To protect your personal information, we may require identification from you before releasing the requested information.

### **Integrity of personal information**

We try to ensure that the personal information we collect is accurate and up to date. If you determine that the personal information is incomplete, has inaccuracies and is out of date, reasonable steps will be taken in such circumstances to ensure that this information is corrected. We will respond to all requests for access to or correction of personal information within a reasonable time.

You may request an update or correction to personal information we hold about you, and we will deal with all such requests as required by the *Privacy Act 1988*.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will not charge any fee for your access request but may charge an administrative fee for providing a copy of your personal information.

### **Marketing and opt-out**

We may provide you with information and advertisements about products, services and promotions either from us, or from third parties which may be of interest to you, where you have asked us to or have otherwise consented to us doing so, or it is otherwise permitted by law.

We will always provide you with a nil-cost way of contacting us to "opt-out" from receiving any marketing communications and product offers. You can also opt-out by contacting us (see "Contact details" section below).

### **Complaints**

If you have any questions, concerns or complaints about this Privacy Policy or how we handle your personal information, including if you believe we have breached the Australian Privacy Principles, please contact us (see "Contact details" section below). We take all complaints seriously and will respond to your complaint in accordance with any applicable timeframes imposed by law and otherwise within a reasonable period. We request that you cooperate with us during this process and provide us with any relevant information that we may need.



When contacting us please provide as much detail as possible in relation to your question, concern or complaint. We take all complaints seriously and will respond to your complaint in accordance with any applicable timeframes imposed by law and otherwise within a reasonable period. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

You may request to obtain a copy of the Australian Privacy Principles, which provides information regarding your rights and the way your personal information should be handled. We will investigate your complaint and try to promptly resolve your complaint directly with you.

Ultimately, if any client wishes to lodge a formal complaint about the use of, disclosure of, or access to, their personal information, or for general enquiries on the operation and application of Queensland's Right to Information and Information Privacy legislation, they may do so with:

The Office of Information Commissioner  
Level 11, 53 Albert Street  
Brisbane, QLD 4000  
Telephone: (07) 3234 7373 or 1800 642 753  
Email: [enquiries@oic.qld.gov.au](mailto:enquiries@oic.qld.gov.au)

## **Changes to this privacy policy**

We will make our Privacy Policy available upon request and will provide a link on our website.

This Policy will be reviewed from time to time, and any amendments will be incorporated into the updated version. We will also notify clients on our website.

## **Contact us**

If you have any questions relating to privacy matters, please contact us

Thoughtful Connections Pty Ltd  
11 Ansdell Street  
Mount Gravatt  
Qld 4122  
Email: [admin@thoughtfulconnections.com.au](mailto:admin@thoughtfulconnections.com.au)