

ARCH PSYCHOLOGY MELBOURNE PTY LTD – PRIVACY POLICY

Arch Psychology Melbourne Pty Ltd (ABN 38 661 508 701) understands that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us when providing our clinical psychology services or when otherwise interacting with you.

The information we collect

Personal information: is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The types of personal information we may collect about you include:

- **Identity Data** including first name, last name, title, date of birth, gender, job title, marital status, and pronouns.
- **Contact Data** including physical address, email address and telephone numbers.
- **Financial Data** including bank account and payment card details (through our third party payment processor eftpos).
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** including internet protocol (IP) address, statistics on page views and sessions, information about your access and use of our website, and your communications with our website.
- **Client Data** including appointments you have made with us, content you send, receive and share through our website, your interests, preferences, feedback and survey responses.
- **Interaction Data** including information you provide to us when you participate in any interactive features of our Services, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.
- **Sensitive information** is a subset of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.
- The types of sensitive information we collect include:
 - personal details which are necessary and relevant to the assessment and/or treatment of your presenting mental health concern and which you choose to share with us. For example, this may include details of your schooling/training/employment status, your marital status, your beliefs, values, and views, Medicare number (if you are referred to us under a mental health treatment plan), details of your referring doctor, an emergency contact name and telephone number, and correspondence with you or with other health professionals about you;
 - sensitive information (including health information) which is necessary and relevant to the assessment and/or treatment of your presenting mental health concern and which you choose to share with us and any mental health assessment or diagnostic opinion we believe it is necessary or relevant to record. The types of sensitive information you choose to share with us may include:
 - detailed information about your current medications, your physical health and detailed information about your psychological health;
 - your gender;

- your racial or ethnic origin;
- your religious beliefs;
- your philosophical beliefs;
- your political beliefs or affiliations;
- your sexual orientation or practices; and
- any other sensitive details you choose to share with us.

How we collect personal information

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when you book an appointment with us, through the 'contact' form or chat function on our website or when you request our assistance via email, or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as from your employer or school where they enrol you in our seminars, details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.

Why we collect, hold, use and disclose personal information

We have set out below, in a table format, a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

Purpose of use / disclosure	Type of Personal Information
To provide our Services to you, including enabling you to access and use our website and associated applications and platforms for telehealth appointments, and to book and manage your appointments.	<ul style="list-style-type: none"> ● Identity Data ● Contact Data
To contact and communicate with you about our Services and your appointments, enable your referring doctor to refer you to us and/or book an appointment for you, register you as a client, and check you into our practice.	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Client Data
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none"> ● Identity Data ● Contact Data
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Financial Data ● Transaction Data
For analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.	<ul style="list-style-type: none"> ● Technical and Usage Data ● Interaction Data
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Technical and Usage Data ● Marketing and Communications Data

Purpose of use / disclosure	Type of Personal Information
To run promotions, competitions and/or offer additional benefits to you.	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Interaction Data ● Marketing and Communications Data
If you have applied for employment with us; to consider your employment application.	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Professional Data
To comply with our legal obligations or if otherwise required or authorised by law.	<ul style="list-style-type: none"> ● Any relevant Personal Information
<p>Sensitive information: We only collect, hold, use and disclose sensitive information for the following purposes:</p> <ul style="list-style-type: none"> ● any purposes you consent to; ● the primary purpose for which it is collected, being the provision of our Services; ● secondary purposes that are directly related to the primary purpose for which it was collected, including disclosure to the below listed third parties as reasonably necessary to provide our Services to you; ● to contact emergency services, or to speak with your family, partner or support person where we reasonably believe there is a serious risk to the life, health or safety of you or another person and it is impracticable for us to obtain your consent; and ● if otherwise required or authorised by law. 	<ul style="list-style-type: none"> ● Sensitive Information

Our disclosures of personal information to third parties

We may disclose personal information to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers for the purpose of enabling them to assist us in providing our Services to you, such as Wix.com, Halaxy, and Coviu;
- marketing or advertising providers;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators such as eftpos;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- third parties to collect and process data, such as Google Analytics (To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time), Facebook Pixel or other relevant analytics businesses; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Google Analytics: We have enabled Google Analytics Advertising Features. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

Overseas disclosure

While we store personal information in Australia, where we disclose your personal information to the third parties listed above, these third parties may store, transfer or access personal information outside of Australia, including but not limited to, United States of America, Ireland and Israel. We will only disclose your personal information overseas in accordance with the Australian Privacy Principles.

Your rights and controlling your personal information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Anonymity: Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you also have the right to contact the Office of the Australian Information Commissioner.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact us at:

Arch Psychology Melbourne Pty Ltd (ABN 38 661 508 701)

Email: enquiry@archpsychologymelbourne.com.au

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