

## PRIVACY POLICY

---

### BACKGROUND

ELISE SAUNDERS (ABN 52 284 453 088) (**Practitioner**) is a therapeutic life story work practitioner and provides therapeutic life story work (**TLSW**) services including practice consultation, clinical supervision, direct client TLSW work, training and workshops (**Services**).

This Privacy Policy sets out how the Practitioner collects, stores, uses and discloses personal information. Through your use of the Practitioner's Services (including use of the Practitioner's website), you are consenting to the collection and use of this information.

The Practitioner takes your privacy seriously and is committed to its compliance with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (**Privacy Act**) and the *Health Records Act 2001* (Vic) as amended from time to time.

### CONSENT

You acknowledge and agree that:

- (a) by registering for the Services and clicking on the "I Agree" field (or any similar field or link designated to indicate your acceptance of this Privacy Policy) on the Practitioner's website or completing and returning the acknowledgment form provided to you by the Practitioner, or by otherwise submitting personal information to the Practitioner or using the Services, you are consenting to providing the Practitioner with your personal information and agree to your personal information being collected, stored, used, processed and disclosed in accordance with this Privacy Policy; or
- (b) you have had a sufficient opportunity to access and review this Privacy Policy and you have read this Privacy Policy (in its entirety) and agreed to its terms;
- (c) you are 18 years of age or older.

If you do not wish to provide personal information to the Practitioner, then you are not obliged to do so. However, please be aware that this will affect the Services offered to you by the Practitioner.

### WHAT INFORMATION DOES THE PRACTITIONER COLLECT?

#### Personally Identifiable Information

Personal information has the meaning given to it under your local data protection laws and generally means information which relates to an individual who can be identified from that information.

The Practitioner collects the personal data necessary to provide you with the Services you have requested. You do not have to provide your personal information, but if you do not do so, the Practitioner may not be able to provide you with some or all of its Services. By disclosing personal information to the Practitioner, you are consenting to its collection.

The specific type of personal information that the Practitioner collects and uses will depend on the Services provided and may include, but is not limited to, the following:

- name and contact information (including telephone and mobile number, email address and residential and postal address, server and IP address);
- individual information (including age, gender, date of birth, interests and communication preferences)
- subject expertise, professional development focus, the name and location of your practice, TLSW experience and qualifications; or
- other personal information (including information contained in communications between you and the Practitioner, or forms or other documents provided to the Practitioner by you and any information the Practitioner is required to collect by law).

Subject to this Policy, the Practitioner may also collect and hold sensitive information and/or health information disclosed by you, including (but not limited to):

- an individual's racial or ethnic origin;
- physical, mental or psychological health of an individual;
- specialist reports and test results;
- genetic information;
- a disability of an individual;
- criminal records;
- sexual preferences/gender identity;
- political or religious views; or
- membership or affiliation with an industry union.

The Practitioner may also collect personal information as it reasonably determines necessary from time to time for any purpose in connection with the Services provided, for example, in dealing with its agents, suppliers, service providers and contractors, internal business purposes or improving its Services.

### **Feedback and surveys**

From time to time you may have the option to participate in surveys or provide feedback intended to improve the Services offered by the Practitioner which may involve providing additional personal information. Your participation in such activities is subject to your consent.

Please be aware that the Practitioner will not collect any personal information from any user of the Service under 18 years of age and all feedback obtained from these users will be gathered on an anonymous basis.

### **IP Addresses**

An Internet Protocol ("IP") address is a small set of numbers automatically assigned to your computer when you log onto the internet. The Practitioner may use general information about your visit to the Practitioner's website, including your IP address and the date and time of your visit, to assist it in improving the quality and useability of the Practitioner's website.

## **Cookies**

Cookies are small text files placed on your hard-disk that allows the server to identify and interact more effectively with your device. The Practitioner may use cookies to identify you as a return user and personalise and enhance your experience and your use of the Practitioner's website.

## **USE OF PERSONAL INFORMATION**

The Practitioner will only use your personal information for the purpose which it was collected or as otherwise in accordance with this Privacy Policy. Purposes for collecting personal information include, but are not limited to:

- providing you or the nominated child or young person with the Services;
- improving the Services;
- notifying you of opportunities (whether product, service, marketing, promotional or advertising related) that the Practitioner thinks you may be interested in;
- responding to your requests, enquiries or applications;
- identifying you when you contact the Practitioner;
- any other purposes identified at the time of collecting your personal information.

In addition, you permit the Practitioner to use your personal information:

- where you have consented to the use or disclosure;
- where the Practitioner reasonably believes that use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety;
- where the Practitioner reasonably suspects that unlawful activity has been, is being or may be engaged in and the use or disclosure is a necessary part of the Practitioner's investigation or in reporting the matter to the relevant authorities;
- where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process);
- to develop and improve the Practitioner's (and the Practitioner's related entities') business, products and services;
- in servicing the Practitioner's relationship with you by creating and maintaining a client profile or presenting options that the Practitioner thinks may interest you based on your browsing and preferences and on your past use of the Services;
- to involve you in market research, gauging customer satisfaction and seeking feedback;
- for research and analysis in relation to the Practitioner's Services; and
- for the Practitioner's internal accounting and administration.

### **THIRD PARTY DISCLOSURE**

By using the Practitioner's Services and/or by providing your personal information (or allowing another person to do so), you acknowledge and consent to the Practitioner disclosing some or all of your personal information to third parties in accordance with this Privacy Policy and in accordance with local data protection laws. This includes disclosure of your personal information and details:

- to payment service providers for any payments you make via the Services (the Practitioner may use a third party payment service provider that is required to take reasonable steps to protect your information);
- to a person that uses the Services on your behalf and/or a person you have authorised;
- to child protective services as and when required and otherwise in accordance with the Practitioner's legal obligations;
- in accordance with requirements or authorisations under applicable laws or to comply with the Practitioner's legal obligations; and
- to any other persons contemplated by this Privacy Policy.

To the maximum extent provided by the relevant laws, the Practitioner is not responsible or liable for the protection and privacy of any personal information which is provided to third parties. This means that, where your personal information has been disclosed, you accept and agree that the disclosed personal information will be held by third parties and may be used by them in accordance with the Privacy Act and any privacy policy they may have and in such circumstances, the third party recipient will be solely responsible for their use of this personal information.

### **STORAGE**

The Practitioner takes all reasonable and lawful steps to keep personal information secure, accurate and up to date and only retain your personal information for as long as reasonably required to satisfy the purpose for which they were collected and used (unless a longer period is necessary for the Practitioner's legal obligations or to defend a legal claim). This means that:

- personal information is stored on secure servers in digital format;
- the Practitioner's employees and data processors are obliged to respect the confidentiality of any personal and/or sensitive information or data and receive training in personal information handling; and
- the Practitioner only permits authorised personnel to access your information.

The Practitioner will take reasonable steps to protect your personal information as you transmit your information from your electronic device and to protect such information from loss, misuse, and unauthorised access, use, modification, disclosure, alteration, or destruction. However, electronic transmission of information is never completely secure or error-free. As a result, while the Practitioner strives to protect users' personal information, the Practitioner cannot ensure or warrant the security of any information electronically transmitted by a user, and users provide their personal information at their own risk. To the maximum extent provided by the relevant laws, the Practitioner is not responsible or liable for the electronic transmission of personal information to the Practitioner or to third parties.

## **OTHER WEBSITES**

The Services the Practitioner operate may contain links to other websites ("Third Party Links"). The Practitioner does not endorse such Third Party Links and are not responsible for any content contained therein. If you decide to access any Third Party Links, you do so entirely at your own risk.

## **ACCESS**

If at any time you would like to access, correct or change any personal information provided by you, please contact the Practitioner via email at [info@tlsw.com.au](mailto:info@tlsw.com.au).

## **COMPLAINTS**

If you know of or suspect any violations of your privacy in connection with the Services and/or the use of the Practitioner's website, please contact the Practitioner immediately.

## **UPDATES**

The Practitioner reserves the right to review, amend, update or change this Privacy Policy from time to time to reflect its practices and obligations under the law. Any changes will take effect when they are made or posted on the Practitioner's website and you are electronically notified of the same.

## **CONTACT**

If you have any questions, comments or concerns about this Privacy Policy please contact the Practitioner via email at [info@tlsw.com.au](mailto:info@tlsw.com.au).

## **FURTHER INFORMATION**

Should you wish to read more information on privacy legislation or the Australian Privacy Principles it is recommended that you visit the website of the office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

Last revised: June 2022