



CREATE VITALITY

Privacy Policy

1. POLICY STATEMENT

Create Vitality recognises that your privacy is important and is committed to protecting your personal information.

The Privacy Act 1988 (Privacy Act), Australian Privacy Principles, health records legislation and registered privacy codes govern the way your personal information is managed. This privacy policy sets out how Create Vitality collects, uses, discloses and otherwise manages your personal information.

Under the Privacy Act, ‘personal information’ is defined as any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. ‘Sensitive information’ is defined as information or an opinion (that is also personal information) about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record, health information, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

2. PURPOSE

This policy outlines Create Vitality’s procedures regarding protecting the privacy of participant information and compliance with legal obligations and legislation.

3. RESPONSIBILITIES

The Director is responsible for keeping up to date with the legislation regarding privacy and updating this policy. All staff are responsible for implementing this



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policy and procedure. All clients of Create Vitality have access to this policy information when they engage with Create Vitality.

4. PROCEDURE

Collection

Types of information collected

Create Vitality may collect and hold personal information about you, that is information that can identify you, and is relevant to providing you with the services you are seeking.

The kinds of information typically collected might include name, gender, address, phone number, email address, credit card details, place and type of business or other information that is relevant to providing you with the services you are seeking. Create Vitality may also collect sensitive information about you, including information about your health, cultural and religious beliefs, with your consent.

Method of collection

Personal information will generally be collected directly from you via the use of standard forms, over the internet, via email, in a face-to-face meeting or through a telephone conversation with you. Personal information may also be collected via third parties acting on your behalf. For example, other allied health professionals, educators or NDIS staff.

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. You will be notified about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.



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Purpose of collection

The personal information that Create Vitality collects and holds about you, will depend on your interaction with Create Vitality. Generally, personal information is collected and held for the purposes of:

- assessing your/your family's support needs, and providing services to you or your family;
- responding to your queries and managing bookings;
- providing you with information about other services that may be of interest to you;
- providing you with information relevant to your area of expertise or interest.
- facilitating internal business operations, including the fulfilment of any legal requirements and invoicing.
- analysing our services and customer needs with a view to improving those services.
- for quality and training purposes.

Failure to provide information

If the personal information you provide to us is incomplete or inaccurate, Create Vitality may be unable to provide you, or your family, with the services you, or they, seek.

Internet users

If you access the Create Vitality website, additional personal information about you may be collected in the form of your IP address or domain name.

Our website may contain links to other websites. Create Vitality is not responsible for the privacy practices of linked websites and any linked websites are not subject to Create Vitality's privacy policies and procedures.

The Create Vitality website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. Cookies are used



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to monitor usage of the Create Vitality website and to create a personal record of when you visit our website and what page you view so that users may be served more effectively. Create Vitality is not responsible for the content or privacy practices employed by websites that are linked from the website.

Use and disclosure

Generally, Create Vitality will only use or disclose personal information about you for the purposes for which it was collected (as set out above). Personal information may be disclosed to:

- your referrer or other healthcare professionals involved in your care, with your permission. This may include reports, service plan and goals, referrer letters and support summaries.
- Other members of you / your family's support team that you have given written consent for information to be provided to. For example, educators, support workers. This may include reports, service plan and goals, referrer letters and treatment summaries.
- Trusted third party service providers who assist us in operating our business (for example, technology service providers),
- Create Vitality may also use or disclose personal and health information where necessary for activities such as; quality assurance processes, accreditation, audits, risk and claims management; Feedback and surveys; Invoicing and billing; To liaise with external agencies, such as NDIA, education department, private health funds or Medicare; Text and email reminders regarding appointments and follow up; The purpose of making calendar appointments in online booking systems.
- Other uses with consent, such as marketing mail list, opt-in pages, or research. Please note, however, that unless Create Vitality gains consent for this purpose, information will not to be used in this way.

In some circumstances, the law may permit or require Create Vitality to use or disclose personal information for other purposes (for instance, where you would reasonably expect us to and the purpose is related to the purpose of collection).



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Except as otherwise permitted by law, Create Vitality will only disclose sensitive information about you with your consent. Information is retained as per legislative requirements.

Security

Your personal information is stored in different ways, including in paper and electronic form. The security of your personal information is important. Create Vitality takes reasonable measures, including electronic and physical security measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, interference, modification or disclosure.

Mandatory breach reporting

Create Vitality aims to ensure that your personal information is handled in strict compliance with the Commonwealth Privacy Act 1988 and will take all reasonable steps to mitigate the risk of a breach of privacy. Where Create Vitality believes that a breach of privacy may have occurred, reasonable steps to manage the situation will be taken. Create Vitality will comply with any applicable breach notification requirements of the Privacy Act, including the requirement to notify you and the Office of the Australian Information Commissioner.

Access and correction

You may request access to personal information held about you by Create Vitality, by making a written request. Create Vitality will respond to your request within a reasonable period. There may be a fee for processing your request (but not for making a request for access). If upon receiving access to your personal information, or at any other time, you believe the personal information held about you is inaccurate, incomplete or out of date, please notify Create Vitality immediately. Reasonable steps will be taken to correct the information so that it is accurate, complete and up to date. If Create Vitality is unable to correct your personal information, written notice that sets out the reasons will be provided (unless it would



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be unreasonable to provide those reasons) and you will be provided with a statement regarding the mechanisms available to you to make a complaint.

Complaints and feedback

If you wish to make a complaint about a breach of the Privacy Act, Australian Privacy Principles, health records legislation or a privacy code that applies to Create Vitality, please contact Create Vitality as set out below and reasonable steps to investigate the complaint and respond to you will be taken. If you are not happy with the response, you may complain directly to the Australian Privacy Commissioner. If you have any queries or concerns about Create Vitality's privacy policy or the way your personal information is handled, please:

1. Contact the Create Vitality Director:

Rachel Stefaniak at: Po Box 7174 Banyule 3084 e: Rachel@createvitality.com.au t: 0400 976 389

2. Or, if relevant, contact the NDIS Commission Feedback and Complaints team.
email: contactcentre@ndiscommission.gov.au telephone: 1800 035 544

For more information about privacy in general, you can visit the Australian Privacy Commissioner's website: <https://www.oaic.gov.au/>

5. FURTHER INFORMATION

For further information on this policy, contact Rachel Stefaniak Director Create Vitality Rachel@createvitality.com.au 0400 976 389

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