



Privacy Policy

Overview

Carnation Lane (ABN 23 960 837 600) is committed to complying with the [Privacy Act 1988](#), and the Australian Privacy Principles under that Act, and the privacy provisions of all applicable legislation.

This Privacy Policy covers all personal information we hold, that is information or opinion that identifies an individual. This includes information we have collected from people through our office, over the phone and over the internet, such as name, address, email address and phone numbers.

Collecting information

Types of personal information we collect

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. 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.

Health information is "sensitive information" - see below for further details.

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).

Sensitive information

Sensitive information is a subset of personal information. If we collect sensitive information (as defined under the Privacy Act), we will treat it with the utmost security and confidentiality.

Sensitive information is defined in the Act to include information or opinion about such things as an individual'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.

Sensitive information will be used by us only:



- for the primary purpose for which it was obtained
- for a secondary purpose that is directly related to the primary purpose
- with your consent or
- where required or authorised by law.

In addition to the types of personal information identified above, we may collect personal information as otherwise permitted or required by law.

Where you choose not to provide requested information, we will advise you of what consequences this non-disclosure may have. For example, withholding certain information may limit our ability to provide relevant services to you.

How we collect your personal information

Some of the common ways in which we may collect personal information include:

- if you are a client, during client on-boarding (i.e. via registration forms) and during treatment sessions
- when you make an enquiry or order in relation to products or services, including through our website or Facebook page
- from correspondence (whether in writing or electronically) or when you contact us via telephone, email, social media platforms or other means
- in administering and performing any contracts with service providers;
- when you apply for a role with us
- if you attend any of our premises, we may record certain contact details so that we can comply with applicable laws, and we may also record your image and/or voice if we have surveillance systems operating at those premises.

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, such as:

- if you are a client, from referrals or reports from other health professionals and
- 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).

Our purposes for handling your personal information

The purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it.

Whenever practical, we endeavour to advise you of the purpose for which your personal information is collected, how we intend to use that information and to whom we intend to disclose it at the time we collect your personal information.

In general, we collect, use and disclose your personal information so that we can provide our 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



- 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.

Even after disclosing your personal information, we have the right to decline any referral without giving a reason. This is to avoid potential conflicts of interest.

Disclosing information

Your personal information may be disclosed to third parties in connection with the purposes for which we collected your personal information, as described above and in any privacy collection notices we provide to you.

This may include disclosing your personal information to the following types of third parties:

- our suppliers, contractors and organisations that provide us with technical and support services or who manage some of our business functions
- our related entities (who may use and disclose the information in the same manner we can)
- our accountants, insurers, lawyers, auditors and other professional advisers and
- any third parties to whom you have directed or permitted us to disclose your personal information (e.g. if you are a client/patient, to your treating doctor and other health professionals, to an insurer/compensation agency and/or your emergency contacts, if necessary).

We may also disclose your personal information in accordance with any consent you give or where disclosure is authorised, compelled or permitted by law.

Overseas transfers

In the ordinary course of our business, we do not generally disclose your personal information to overseas recipients.

The Client Management System we use, Halaxy, is an international platform and their Privacy Policy can be accessed at [Halaxy - Helping You Navigate the Complex Galaxy of Health](#).

Accessing and correcting your personal information

You may contact us (see "Contact details" section below) to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. We will respond to all requests for access to, or correction of, personal information within a reasonable time.



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.

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.

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

Storage and Security

We will hold personal information as either secure physical records, electronically on our computer systems, in cloud storage, and in some cases, on third-party servers. The current client management platform being used is Halaxy and you can access their privacy policy online at [Halaxy - Helping You Navigate the Complex Galaxy of Health](#). Our online platforms are co-managed by CodeMash (for further information go to <https://codemash.com.au>) and any enquiries made via our online platforms may be accessible to CodeMash. CodeMash have been contracted to maintain confidentiality in any matters they may come across via online maintenance or upgrades. Microsoft products are used daily including email and other suites.

Our goal is to protect the personal information collected by us. We take all reasonable steps to keep your personal information secure, safe and protected from misuse, interference, loss or unauthorised access.

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).

Data quality

We will take all reasonable steps to ensure that the data we collect, use or disclose is accurate, complete and up to date and has been obtained directly from you or other reputable sources.

If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Availability and review of Policy

We will make our Privacy Policy available upon request and will provide a link on our website (when established). A copy of our Privacy Policy will be sent at the commencement of services.

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



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).

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.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner

GPO Box 5288, Sydney NSW 2001

Telephone: 1300 363 992

<https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>

Contact details

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Acknowledgements

This Privacy Policy was created using a template provided by the Australian Association of Social Workers (AASW), which includes content from these resources:

- Template Privacy Policy for Private Practitioners, Allied Health Professions Australia (AHPA)
- Privacy Policy Template, Business Victoria