

Privacy Policy

Relational Skills Australia Pty Ltd ABN 67 154 789 527, trading as Relational Skills, ConnectGround Gestalt Centre ("ConnectGround"), Gestalt Therapy Australia ("GTA") and the Gestalt Centre (in this policy, "we") are committed to protecting the privacy of the information that we collect about you.

Whose personal information do we collect?

We collect personal information from clients of ConnectGround and Relational Skills, current and past students of GTA, staff, volunteers, psychotherapists who rent office space at the Gestalt Centre and other people who are interested in our work.

How do we collect your personal information?

We collect personal information in a number of different ways including through forms, over the telephone and from our website. We collect personal information for the purposes of carrying out our services.

Our services include:

- Gestalt therapy education and professional development
- a community psychotherapy clinic
- training in business relational skills
- providing commercial psychotherapy office space.

What personal information do we collect?

We will only collect information if it is relevant and reasonably necessary for one of our functions or activities. The information will be collected by lawful and fair means.

We will usually collect personal information directly from you and with your consent. However, we sometimes need to collect information from a third party, such as your authorised representative, or from public sources.

Collection of sensitive information

Sometimes we may need to collect sensitive information about you. This might include information about your health, racial or ethnic origin, political opinions, association membership, or criminal history.

As part of administering our services, we may collect health information. For example, we may collect medical history from some clients. When collecting health information from you, we will obtain your consent and explain how the information will be used and disclosed.

If we collect health information from a third party, such as your doctor, we will inform you that this information has been collected and will explain how this information will be used and disclosed.

Use and disclosure

We will normally use or disclose personal information only for the purposes that it was given to us, and for purposes that are related to one of our services or activities.

However, we may disclose personal information to external organisations including:

- government departments or agencies who provide funding for our services
- our professional advisors, including our accountants, auditors and lawyers.

Except as set out above, we will not disclose your personal information to a third party unless one of the following applies:

- you (or the individual for whom you are the representative) have consented
- we believe you would reasonably expect us to use or disclose the information for another reason related to the purpose for which it was collected (or in the case of sensitive information, directly related to the purpose for which it was collected)
- we are required to do so by law
- · it will prevent or lessen a serious threat to somebody's life, health or safety or to public health or safety
- it is necessary for the management, funding or monitoring of a health service relevant to public health or safety
- it is reasonably necessary for the enforcement of a law conducted by an enforcement body
- it is reasonably necessary to assist in locating a missing person
- it is reasonably necessary to the conduct of proceedings before a court or tribunal, or for a confidential dispute resolution process.

Marketing and communications

We may use personal information that we have collected to contact you about our activities, and to provide you with newsletters and invitations. We may contact you using a number of different mediums for example by phone, mail, email, social media or text message.

The various businesses run by Relational Skills Australia may share information with each other for marketing purposes.

You will be offered the opportunity to opt out if you do not wish to receive this information. You can also contact us on the details below if you prefer not to receive future communication from us.

Online

When you access our website or connect with us through social media, we or our third party service providers may use 'Cookies'. These small data files placed on your device do not identify individuals personally but do identify devices. We may also use software such as Java script, or similar technology.

This allows us to:

- remember your details and preferences when you return
- maintain the continuity of your browsing session

- use Google Analytics to collect information such as demographics and interests, visits to our websites, length of visit and pages viewed
- tailor our advertising through networks on other websites.

You can set your browser to notify you when you receive a Cookie and this will provide you with an opportunity to either accept or reject it in each instance. Please note that if you do this, it may affect some of the functions on our website.

We take great care to protect your personal information on our website and whenever you communicate with us. Once we receive your personal information, we take reasonable steps to protect its security.

Quality of the information that we hold

We take reasonable steps to ensure that the personal information that we collect, use or disclose is relevant, accurate, complete and up to date. If at any time you wish to update your personal information, you can do so by contacting our Privacy Officer (details below).

Security of the information that we hold

We take reasonable steps to protect the personal information that we hold from misuse, loss, interference and from unauthorised access, modification and disclosure.

These measures include password protection for accessing our electronic IT systems, securing paper files in locked cabinets and physical access restrictions.

We will notify any affected individual in the event that a data breach will likely result in serious harm.

Retention and disposal of information

We only keep personal information for as long as is required. Information that is retained will be archived in such a way that facilitates easy retrieval yet does not compromise security.

When personal information is no longer required it is destroyed in a secure manner.

Access and correction of information that we hold

If you request access to the personal information we hold about you, or request that we change that personal information, we will allow access or make the changes to your personal information unless we consider there is a sound reason under the privacy legislation to withhold the information or not to make the changes.

Requests for access should be made to the Privacy Officer. For security reasons, you will be required to put your request in writing and provide proof of identity. This is necessary to ensure that personal information is only provided to the correct individuals and the privacy of others is not undermined.

We will take all reasonable steps to provide access or the requested information within 14 days of your request. In situations where the request is complicated or requires access to a large volume of information, we will take reasonable steps to provide access to the requested information within 30 days.

In general, access will be denied where:

- the request does not relate to the personal information of the person making the request
- providing access would pose a serious threat to the life, health or safety of the person making the request
- providing the information would have an unreasonable impact on the privacy of other individuals
- the request for access is frivolous or vexatious
- the information relates to existing or anticipated legal proceedings
- providing access would prejudice negotiations with the individual making the request
- providing access would be unlawful
- denying access is required or authorised by law
- providing access would be likely to prejudice
- law enforcement activities
- an action relating to suspected unlawful activity, or misconduct of a serious nature relating to our functions or activities
- access discloses a commercially sensitive decision making process or information
- any other reason that is provided for under the privacy legislation.

Where an individual is given access to personal information and establishes that the information is not accurate, complete or up to date, we will take reasonable steps to correct the information accordingly. If the individual disagrees about the content of the information, the individual may request that we add a statement claiming that the information is not accurate, complete or up to date. We will take all reasonable steps to do this.

If we refuse to provide access or make changes, we will provide reasons for doing so to the individual.

Upon request for access to or correction of personal information we will:

- provide access or reasons for denial of access
- correct the personal information or provide reasons for refusal to correct personal information
- provide reasons for the delay in responding as soon as practicable but no later than 30 days after receiving the request.

If we deny access to information, we will set our reasons. Where there is a dispute about your right of access to information or forms of access, this will be dealt with in accordance with the complaints procedure set out below.

Complaints procedure

If you have provided us with personal and sensitive information, or we have collected and hold this information, you have a right to make a complaint and have it investigated and dealt with under this complaints procedure.

If you have a complaint about our privacy practices or our handling of your personal and sensitive information, please contact our Privacy Officer (details below).

Anonymity

Where lawful and practicable, we will take all reasonable steps to comply with a request to access our services on an anonymous basis or using a pseudonym. However, we may not be able to deliver the services in question if you do not provide us with the personal information requested.

Transborder data flows

If we are otherwise required to send information overseas we will take measures to protect your personal information. We will ensure that either the destination country has similar protections in relation to privacy or that we enter into contractual arrangements with the recipient of your personal information that safeguards your privacy.

Changes to this Privacy Policy

We reserve the right to review, amend and update this policy to ensure alignment with new legislation, standards and regulation. This policy was last reviewed and updated in October 2021.

How to contact us

If you have any queries, complaints or comments in relation to this privacy policy, please contact our Privacy Officer at:

Relational Skills Australia 622 Lygon Street Carlton North Victoria 3054

Phone: 9489 6300

Email: admin@gestaltcentre.com.au

For information about privacy generally, or if your concerns are not resolved to your satisfaction, you can contact:

The Office of the Australian Information Commissioner on <u>1300 363 992</u> or go to <u>Office of the Australian Information</u> <u>Commissioner</u>

The Office of the Victorian Information Commissioner on <u>1300 006 842</u> or go to <u>Office of the Victorian Information Commissioner</u>