



Privacy and Information Handling Policy

Playology collects, works with and retains its clients' personal information. This information is important in the optimal provision of services. However, it is also important that the information is appropriately managed in accordance with law and ethical guidelines of the profession. This policy outlines how Playology handles clients' personal information, in accordance with Australian Privacy Principles.

What is personal information?

Personal information is any information which identifies you or could reasonably be used to identify you.

What personal information do we collect and why?

When you or your child is to receive or is receiving a service from Playology, we will collect and hold your personal information to:

- Gain an understanding of your/your child's needs so may provide you with the required service and advice
- Contact you to provide advice or information
- Improve the quality of our service
- Administer and manage those services, including billing and meeting funding accountability requirements
- Where required by law

In order to provide optimal services, Playology will collect information from clients or referrers. As a base, the following information will likely be collected during intake processes:

- Your name, address and date of birth
- Your contact details
- Relevant medical information
- Information for billing, including funding (e.g. Medicare, NDIS). A credit card is required to be held on file to secure appointments
- Other information necessary for us to deliver services to you

In addition, in the provision of services Playology will in all likelihood collect the following personal information, either in "paper and pencil" format or via a computer:

- Information pertaining to your session notes; treatment plan and your response to treatment.
- Responses and results from assessments, including reports

Use and disclosure of personal information

Playology will use and disclose personal information for the primary purpose of providing optimal services.

Playology is committed to the confidentiality of all information collected. The limits of confidentiality include instances where:

- Prior informed consent has been obtained to provide or receive information from another professional or agency, such as your child's school, GP, paediatrician, legal representative, or relevant government department.

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- Failure to disclose the information would place the client or another person at risk of any harm.
- A legal guardian requests access to the records of their child who is aged under 16 years.
- Records are subpoenaed by a court of law

For the purposes of funding (including NDIS claims and Medicare rebates), the following information may be shared with the relevant third party for billing purposes. Note that no detail regarding the content of services is provided (e.g. session notes, goals):

- Client details
- Practitioner details
- Date, time and duration of services
- Location of services
- Type of service provided.

Storage and security of personal information

All Playology team members will take reasonable steps to protect the personal information of clients from misuse, interference or loss, and from unauthorised modification, access or disclosure.

Paper documents containing personal information listed above will be stored under lock. Electronic information containing personal information listed above will be stored and backed up securely, using multi-factor authorisation.

Playology utilises Halaxy as our practice management software. With Halaxy, data is backed up daily and protected by bank grade security and encryption here in Australia. Halaxy is hosted on Amazon Web Services (AWS), one of the most used and well-regarded hosting services in the world. AWS physical access is controlled using human and video surveillance, intrusion detection systems, and world class security protocols.

Halaxy's payments gateway is powered by Braintree in Australia, which is owned by Paypal, one of the world's largest payments providers.

As a security measure, card details are stored through our partners and not stored by Halaxy directly, so payment data is not stored with patient records and Halaxy cannot retrieve card details. When a client's card details are entered into Halaxy, the details are stored and tokenised by Halaxy's payments gateway. This means that once initially entered and captured, card details are not visible to anybody within the practice or at Halaxy, and cannot be retrieved by Halaxy. If card details need to be altered or updated, payment details need to be completely re-entered (as a tokenised card is unable to be edited).

Playology Clinic also utilises Heidi Health. Heidi Health AI is an advanced tool that helps our therapists create accurate and comprehensive clinical notes during sessions. It records sessions, generates a transcript, and creates draft notes, which our therapists review and edit for accuracy. Heidi Health AI complies with ISO 27001:2013 standards for information security management. No detailed personal information such as date

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of birth or address is recorded. The recordings are not retained beyond the session, by either Playology or Heidi Health.

Accessing your personal information

The records we collect remain the property of Playology, however you have the right to access this information subject to some exceptions allowed by law. You can request access to your records by contacting Playology. We will disclose to your authorised representative or legal advisor where you have provided written authority.

What if there is a privacy breach?

We follow the national requirements. See here: <https://www.oaic.gov.au/privacy/notifiable-data-breaches/>

Complaints

If you believe that we have breached your privacy rights in any way or wish to discuss any issues about our privacy policy, please contact the Playology management team.

You also have the right to make a complaint to the Office of the Australian Information Commissioner (<https://www.oaic.gov.au/privacy/privacy-complaints/>)



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