



## Privacy Policy and Procedures

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Approved by the Managing Director of X-Tremity Prosthetics & Orthotics Pty Ltd  
on 02 June 2019.

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#### Version Control

Contact person	Role	Ver No	Date	Review Date
Warren Fahey	Consultant	1	02 June 2019	02 June 2022

## 1. About X-Tremity

X-Tremity Prosthetics & Orthotics Pty Ltd (“X-Tremity”) is the go-to company for prosthetic and orthotic fittings, modern components, complex materials and their exemplary fabrication techniques.

With a background in prosthetic consultation and training across Australia X-Tremity brings the highest standards and componentry of the prosthetic industry to the Shoalhaven and beyond.

Our medical team will assess you utilising many years of experience in the field and create an individual customised plan for you.

We will design and implement the optimised prosthetic or orthotic system available for you – whether you are a Paralympic competitor, special forces’ soldier or amputee (from young to older or from very active to not-so-active).

X-Tremity aspires to help to restore and maintain mobility for people with disabilities on the basis of its commitment to person-to-person care. Throughout the process we will communicate effectively ensuring high-level awareness of issues and options.

Of course, X-Tremity recognises that the people we assist may offer compliments, complaints or feedback and is committed to resolving complaints quickly, fairly and effectively. One of the ways X-Tremity will continue to improve the way it works is to listen and respond to the compliments, complaints and feedback it receives in a positive and constructive manner.

All of this combines to perfectly position X-Tremity to provide its clients a range of customised products that maximise their mobility.

## 2. Policy and Procedures Purpose

X-Tremity is committed to providing quality services to its NDIS Participants, EnableNSW Consumers and other valued Clients. This policy and associated set of procedures outlines X-Tremity’s ongoing obligations to all Clients in respect of how we manage their Personal Information.

## 3. Scope

This Policy applies to all X-Tremity employees and Clients.

## 4. Definitions

**Client:** A Client is a person receiving goods and/or services from X-Tremity.

**Employee:** An employee is a person who is hired to provide services in exchange for compensation (pay) (Australian Taxation Office, 2012). An employee is a paid member of staff – this can be on a full-time, part-time, fixed term or casual basis. This includes contractors providing services to X-Tremity for a set time or specific task and those engaged in the performance of duties for X-Tremity from a labour hire agency.

## 5. Aims of the Policy and Procedures

X-Tremity's Privacy Policy & Procedures ensures that X-Tremity has an effective, efficient and lawful approach in collecting, using, disclosing, storing, securing and disposing of your Personal Information.

## 6. Reference

X-Tremity has adopted the Australian Privacy Principles ("APPs") contained in the [Privacy Act 1988 \(Cth\)](#) ("the Privacy Act"). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aoic.gov.au](http://www.aoic.gov.au)

## 7. Privacy Information

### What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website [www.x-tremity.com](http://www.x-tremity.com), from media and publications, from other publicly available sources, and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

## 8. Sensitive Information

Sensitive information is defined in the Privacy 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; and
- with your consent; or where required or authorised by law.

## 9. Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

## 10. Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- third parties where you consent to the use or disclosure; and
- where required or authorised by law.

## 11. Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of seven (7) years.

## 12. Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing:

by mail: X-Tremity Prosthetics & Orthotics Pty Ltd  
1/12 East Street  
NOWRA NSW 2541

by email: [jens@x-tremity.com](mailto:jens@x-tremity.com)

X-Tremity will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

## 13. Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. 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.

## 14. Effectiveness and Review

The Managing Director will review this Policy and Procedures document each 36 months on the anniversary of its approval.