



Client Privacy & Confidentiality Policy

Orana Health Services P/L practice provides services that are managed according to the Code of Ethics of the Australian Association of Social Workers (AASW). Orana Health Services P/L is committed to taking all appropriate measures to ensure the personal information of clients is protected from unauthorised access, loss, misuse, disclosure or alterations. All persons, who have access to confidential information, have a responsibility to maintain privacy, confidentiality and security of such information.

This service is committed to protecting your privacy in accordance with the national privacy principles of the Amendment Act of 2000 of the Privacy Act 1998, Health Records Act 2001 and Information Privacy Act 2002 (Victoria).

Management of Client Information

- Orana Health Services P/L will only collect, and record information provided by you, or others you may consent to be contacted, for example your treating General Practitioner (GP); this is necessary for the practice of clinical Social Work.
- During the course of each therapy session, brief notes are recorded.
- All information will be treated with respect and confidentiality. If you have any concerns, initially discuss these with the clinician.
- Your personal and/or identifiable information will not be disclosed without your consent. Where disclosure is mutually agreed, this includes other professionals and family members, written consent will be requested and kept on file. You will be informed if any contact occurs.
- Active files containing personal client information will be securely stored and remain the property of Orana Health Services P/L, except in circumstances where mandated and legally required to provide such information, for example court ordered subpoenas.
- Orana Health Services P/L staff are required to maintain professional continuing education as guided by the AASW; this will require at times consulting with colleagues using de-identified clinical cases for the purpose of professional development and supervision.
- Information collected will only be used for the purpose for which it is collected, and all records and electronic data are protected from unauthorised use, or access. This information is required for at least four years or as otherwise required. The disposal of information is carried out in accordance with legal requirements.
- The Privacy Act outlines a process to request access to personal information; please discuss with Orana Health Services P/L staff if required.



Detailed Privacy Policy

Introduction

1. Orana Health Services P/L (ACN 159062263) (Orana Health Services P/L, we, us) is committed to protecting the information about you that we collect, store and use when you provide it to us on our website: <https://www.oranahealth.com.au> (Site).
2. We respect your rights to privacy under the Privacy Act 1998 and so in accordance with this Act, we are compliant with its requirements in respect of the collection, management and disclosure of your personal information.
3. If you do not wish to provide personal information to us, then you do not have to do so. However, this may affect your use of the services provided by Orana Health Services P/L, the website www.oranahealth.com.au or any products and services offered on it.

What is your personal information?

4. When used in this privacy policy, the term “personal information” has the meaning given to it in the Privacy Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.
5. We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website and other services and products.
6. Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.

What information may we collect from you?

7. Orana Health Services P/L may collect the following personal information from you:
 - a. name;
 - b. current mailing or residential address;
 - c. email address;
 - d. telephone number;
 - e. age or birth date; and
 - f. profession or occupation.



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8. We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service. We collect, hold, use and disclose your personal information for the following purposes:
 - a. to provide our services to you;
 - b. to send communications requested by you;
 - c. to answer enquiries and provide information or advice about existing and new services;
 - d. to provide you with access to protected areas of our website; and
 - e. to comply with any Law, rule, regulation, Lawful and binding determination, decision or direction of a regulator, or in cooperation with any governmental authority.

How do we collect your personal information?

9. We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:
 - a. when you make an enquiry about our services;
 - b. through your access and use of our website, including when you register as a member of our website;
 - c. during conversations between you and our representatives;
 - d. when you ask to be placed on one of our subscription/ mailing lists; or
 - e. when you become a client or customer of ours or otherwise use our products or services.

What happens if we can't collect your personal information?

10. If you do not provide us with the personal information described above, some or all of the following may happen:
 - a. we may not be able to provide our products or services to you, either to the same standard or at all;
 - b. we may not be able to provide you with information about services that you may want, including information about special promotions; or
 - c. we may be unable to tailor the content of our website to your preferences and your experience of our website may not be as enjoyable or useful.

Site User Tracking Experience

11. We may use tracking software to review and improve your experience of our Site. In particular, we may use Facebook, click funnels, Infusionsoft, MaillChimp and Google Analytics Advertising products: Remarketing with Google Analytics and Google Analytics Demographics and Interest Reporting. Google Analytics collects data about our Site traffic via Google Advertising cookies and anonymous identifiers. Data collected via these



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Google products is not linked with any personally identifiable information you submit while on our Site. If you wish to opt out of the Google Analytics data collection, you may do so on Google's Site at <https://tools.google.com/dlpage/gaoptout/>.

Security

12. As our website is linked to the Internet, and the Internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the Internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Links

13. We provide links to websites outside of our website, as well as to third party websites (such as social media sites). These linked sites are not under our control, and we cannot accept responsibility for the conduct of companies linked to our website. Before disclosing your personal information on any other website, we advise you to examine the terms and conditions of using that websites and its privacy policy. Third party websites are responsible for informing you about their own privacy practices.

Groups and forums

14. If you participate in a discussion forum, chat room or webinar, you should be aware that the information you provide there will be made broadly available to others, potentially inside or outside of Orana Health Services P/L, who have access to that discussion forum or chat room. Also, please recognise that individual forums and chat rooms may have additional rules and conditions. Each participant's opinion on a forum or chat room is his or her own and should not be considered as reflecting the opinion of Orana Health Services P/L.

To whom will Orana Health Services P/L disclose my personal information?

15. We may disclose your personal information to:
 - a. our employees, contractors or service providers for the purposes of operating our website or our business, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;





- b. suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
 - c. any other organisation for any authorised purpose with your express consent.
16. We only disclose this information if the third party has agreed to comply with the standards in our Privacy Policy.
17. If there is a change of control of our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at Law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser. We would seek to only disclose information in good faith and where we have sought to maintain confidentiality.

Direct marketing materials

18. We may send you direct marketing communications and information about our services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing Laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our subscription/ mailing list.
19. We do not provide your personal information to other organisations for the purposes of direct marketing.

Security and data quality

20. We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.
21. We strive to ensure the security, integrity and privacy of personal information that you submit to us through our website. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure. We endeavour to take all reasonable steps to protect the personal information you may transmit to us or from our online products and services. Once we do receive your transmission, we will also make our best efforts to ensure its security on our systems.





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22. In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.
23. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by Law to retain it (whichever is the later).

How long do you retain my personal data for?

24. We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
25. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
26. By Law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for five years for Australian tax Law purposes.
27. In some circumstances you can ask us to delete your data; see your legal rights below for further information.
28. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

How can you access and correct your personal information?

29. You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.
30. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it



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would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

31. If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires correction. If we do not agree that there are grounds for correction, then we will add a note to the personal information stating that you disagree with it.

How can you withdraw your consent to this privacy policy?

32. You may withdraw your consent to this privacy policy at any point. If you wish to withdraw your consent to our collection and retention of your data, please contact our Data Protection Officer at info@oranahealth.com.au and we can arrange for your data to be deleted.
33. You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us at the email address listed in this Privacy Policy.
34. To unsubscribe from our e-mail database, or opt out of any communications, please contact us at the email address listed at the start of the Privacy Policy, with "Unsubscribe" in the subject line of the e-mail.

What is the process for complaining about a breach of privacy?

35. If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (and in any event within the time required by the Privacy Act).

Contacting us

36. If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your Data Protection Officer using the details set out below. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.
37. Please contact our Data Protection Officer by email on info@oranahealth.com.au.



Changes to our privacy policy

38. We may change this privacy policy from time to time, however we will notify you of any changes to our privacy policy. Any updated versions of this privacy policy will be posted on our website and will be effective from the date of posting.

39. This privacy policy was last updated on 1st June 2018.