

## F-162 Website Privacy Policy

This policy outlines how neuroCare manages privacy protection of your personal information, including personal information collected and exchanged through the website neurocareclinics.com.au, and for what purposes We process this data. By using this website, submitting your contact details to receive communications from Us, and otherwise providing your personal information to Us, you agree to the terms and conditions of this privacy policy.

neuroCare Group Pty Limited ACN 605 782 474 and associated legal entities trading as neuroCare (“**Our**”, “**Us**” and “**We**”) are committed to protecting your privacy and the privacy of personal information provided to Us. We comply with the relevant Australian Privacy Principles set out in the Privacy Act 1988 (Cth) and as relevant the Health Records Act 2001 (Vic) and the Health Records and Information Privacy Act 2002 (NSW). In this policy, the meaning of the terms ‘personal information’, ‘health information’ and ‘sensitive information’ is affected by those Acts.

This policy outlines how We manage privacy protection of your personal information.

### 1. What personal information do We collect and why do We need and use it?

We generally collect personal information to enable to Us to provide Our mental health assessments, programs and services and to achieve a high quality of service provision.

The service may be conducted by medical practitioners, registered psychologists and speech pathologists (**Clinicians**).

From time to time, We may also collect, Use and disclose personal information for quality assurance, risk management, billing and administrative purpose.

We need to collect a broad range of personal information (such as your basic contact details) and sensitive information including your health history, past, present and future provision of health services, health and developmental information, previous assessments, reports from other professionals, testing results and analysis, information regarding current academic and social skills, related family background information and any information to assist Us in providing Our services.

### 2. How do We collect the personal information?

We may collect your personal information in person, in writing, by telephone, through Our website (including through completion of our Contact Form) and by other electronic communication channels. This may be done by Our staff and through your doctor and other service providers. Wherever practicable, information will be collected from you directly.

We may need to obtain personal information from other health providers, with your consent, to ensure that We are fully informed in relation to the issues that We need to address.

We collect personal information when recruiting staff or when people approach Us expressing an interest in working with Us. This information may be collected through material submitted to Us, interviews and discussions with the person concerned or others nominated by that person.

We may collect personal information through events that We hold or are involved in, such as seminars, workshops, educational programs and other promotional activities.

If you agree to be contacted about research opportunities for which you may be eligible, We may place your name and contact details onto Our internal volunteer research database. At any time, if you no longer wish to participate in research just let Us know and We will remove your details from that database.

### **3. Who will see or have access to your personal information?**

Unless We are required to provide your personal information to others by law, by court order or to investigate suspected fraud or other unlawful activity, your information will only be seen or used by persons working in or for Us on a need to know basis and to the general practitioner or other Clinician as nominated by You to Us.

We may subcontract some medical or allied health services to Clinicians and your personal information may be disclosed to those Clinicians for the purpose of providing services for you.

We may disclose personal information as required or permitted by law or with your prior consent.

You may request access to your personal information in accordance with applicable Federal and State laws. To request access, please email [info@neurocaregroup.com](mailto:info@neurocaregroup.com).

### **4. Direct marketing communications and how to 'opt-out'**

When you freely provide your personal information to Us, you may opt-in to receive direct marketing communications, such as information about other programs and services We provide, surveys, research opportunities, event information, advocacy opportunities and fundraising campaigns related to Our operations and activities. We do not use sensitive information (such as health information) for marketing purposes without your consent.

You can choose to 'opt-out' of direct marketing communications at any time by selecting 'unsubscribe' on any of Our email direct marketing communications sent by Us, or by contacting Us here [info@neurocareclinics.com.au](mailto:info@neurocareclinics.com.au)

If you choose to 'opt-out' of receiving direct marketing communications, you may be asked to provide your full name, contact details and date of birth for verification purposes.

We also comply with the "do not call register."

### **5. Security of Information**

Our information systems and files are kept secured from unauthorised access and Our staff and service providers have been informed of the importance We place on protecting your privacy and their role in helping Us to do so. Information will be stored and disposed of in a secure environment, which may only be accessed by authorised personnel on a need-to-know basis.

To ensure protection of information collected from misuse, loss, unauthorised access, modification or disclosure, processes have been implemented including locked storage of paper records and security protected access rights to computerised records.

Although We will take reasonable steps to protect your personal information, We are unable to guarantee that any information you transmit to Us over the internet is 100% secure. Any information you transmit to Us over the internet is conducted at your own risk.

### **6. What if I want to access and check what personal information you hold about me?**

Subject to any legal restrictions, We are happy to advise you what personal information We hold about you and provide to you access to that personal information, should you request this. If your

request is particularly complex or requires detailed searching of Our records, there may be a reasonable cost to you in order for Us to provide this information.

If you believe there are errors in Our records about you, please let Us know and We will be happy to investigate and correct any inaccuracies.

## **7. Cookies**

Our website Uses cookies to provide a better browsing experience. If you prefer not to have cookies collected, you can disable this option in your browser settings.

## **8. Third-party links**

Occasionally, at Our discretion, We may include or offer third-party products or services on Our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, We seek to protect the integrity of our site and welcome any feedback about these sites.

## **9. Google Analytics, etc.**

We Use products such as Google Analytics to analyse the audience statistics of Our website to improve Our content. No personal information is collected from Google Analytics.

## **10. Do We send information overseas?**

We may disclose personal information to overseas recipients in order to provide Our programs, services and/or products and for administrative or other business management purposes.

This includes:

- the disclosure of personal information to Our parent company in Germany.
- the disclosure of personal information to HubSpot, Inc. (HubSpot), a company incorporated in the United States of America, which provides Us with a Customer Relationship Management platform (CRM) (see details below).

Overseas recipients may have different privacy and data protection standards. However, before disclosing any personal information to an overseas recipient, We take steps reasonable in the circumstances to ensure the overseas recipient (and any subcontractors engaged by the overseas recipient) complies with the Australian Privacy Principles and other applicable privacy laws, or is bound by a substantially similar privacy scheme, unless you consent to the overseas disclosure or it is otherwise required or permitted by law.

We have entered into a contractual arrangement with HubSpot that requires HubSpot to handle personal information stored on the CRM in accordance with the Australian Privacy Principles and other applicable privacy laws or a substantially similar privacy scheme. We will only provide access to and/or disclose personal information to HubSpot for the primary purpose for which it was collected, being:

- to store information, including personal information, collected through the completion of Our Contact Form, on our websites:  
<https://neurocareclinics.com.au>,  
<https://listenandlearn.com.au/>
- to Use personal information stored on HubSpot to generate a quotation detailing the programs and services We can provide and their associated costs;
- to generate and send a questionnaire to be completed by the patient (or patient's guardian), if a patient makes a booking with Us;

- to track a patient's general progress through the programs and services provided by Us;
- to provide to an individual information about other programs and services offered by Us that fit the individual's profile.

Your sensitive information (including health information) will only be disclosed to HubSpot by Us to the extent that sensitive information is included by you in Our Contact Form.

If you have any queries or objections to such disclosures, please contact Our Operations Manager on the details set out in paragraph 11.

## **11. Complaints and further information**

If you would like further information on Our privacy policy or to access or correct your personal information, please contact:

Angela McGuire, Operations Manager  
neuroCare Group Pty Ltd  
M +61 403 672 453  
E: [angela.mcguire@neurocaregroup.com](mailto:angela.mcguire@neurocaregroup.com)

If you have concerns about how we deal with privacy issues you can contact Our Privacy Officer or the Office of the Australian Information Commissioner:  
<http://www.oaic.gov.au/privacy/privacy-complaints>