

Privacy Policy

This Privacy Policy applies to Stephanie Crawford Speech Pathology Pty Ltd ACN 150 845 097 (**Stephanie Crawford, we, us, our**) when we collect personal information about you.

We have developed this Privacy Policy to inform you of how we manage the personal information that we collect about you.

You are under no obligation to provide us with your personal information, but if you do not, we may not be able to provide you with the products, services or information you have requested, or any of our information, services or products.

By providing personal information to us or by becoming a client of Stephanie Crawford, you are taken to have read this Privacy Policy, and consent to the collection, use disclosure and handling of your personal information in accordance with this Privacy Policy.

How we collect your personal information

Personal information has the meaning given to that term in the *Privacy Act 1988* (Cth) (**Privacy Act**) and includes information or an opinion (whether true or not) about an identified individual, or an individual who is reasonably identifiable.

In general, we collect personal information about prospective and actual clients, parents and guardians of clients or prospective clients, referrers, suppliers, contractors and consultants of Stephanie Crawford, and any person who applies to become an employee or contractor of Stephanie Crawford.

We aim to collect personal information only if it is reasonably necessary to providing the services, products or information you have requested from us.

In the course of providing you with services, we collect personal information in a variety of ways.

Unless it is unreasonable or impracticable to do so, we collect your personal information from you directly. In some cases however, we will collect information about you from a third party.

For example, if you are a client or prospective client, we may collect personal information about you from:

- your parent or guardian; and
- other businesses involved in our business or your care, including the National Disability Insurance Scheme (**NDIS**), our business partners and third parties that assist us to provide services to you or refer or introduce you to us (including other health practitioners or your education provider).

At the time of collection, or as soon as practicable after we have collected it, we will take such steps as are reasonable in the circumstances to notify or make you aware of the collection and of any matters relevant to the collection, unless it is obvious from the circumstances that you would know or would expect us to have the information.

Stephanie Crawford may collect personal information about you when you:

- become a client (or parent or guardian of the client);
- make an enquiry with us by phone, email or on our website (www.crawfordspeech.com.au (**Website**));
- engage with us in the course of receiving products, services or information from us or enquiring about our services, information and products;
- visit our Website;
- subscribe to receive newsletters or information from Stephanie Crawford;
- provide us with, or we collect, your business card;
- apply as a candidate for a position with us; and
- supply goods or services to us.

What kind of personal information we collect about you

The types of personal information that we collect from you will depend on the services we provide you with, how you use our Website or if the law requires us to collect it. For example, we may collect the following about you:

- your name;
- your email address, phone number, address and other contact details;
- age and gender;
- personal interests;
- medical or health information about you, including your communication issues and your COVID-19 vaccination status;
- financial information including credit card details;
- details of the information or services we have provided to you or the information, products or services that you have enquired about, including any additional information necessary to deliver those services and respond to your enquiries; and
- details about you to assist in managing our relationship with you and providing you with our services.

Cookies on our Website

We may use cookies on some areas of our Website. A cookie is a small file saved on your computer's hard drive. When you return to our Website, the data saved in the cookie is sent back to the Website. We use cookies to gauge visitor traffic, trends and to help us serve you more efficiently if you revisit the Website. The cookies we use in no way give us access to your computer or any information about you, other than the information you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our Website.

Use and Disclosure of Personal Information

We collect your personal information primarily to:

- provide our services, products and information to you;
- communicate with you generally in relation to our services and products;
- help us manage our products and services; and
- otherwise manage our relationship with you.

If it is reasonable to expect that we would use or disclose your personal information for purposes which are related to the above primary purposes, we may also use or disclose your personal information to:

- assist you with enquiries or complaints;
- comply with our reporting requirements, including under Medicare and the NDIS;
- develop and improve our client service and relationships;
- promote, advertise and market any of our services and products, including to invite you to events or activities hosted by Stephanie Crawford;
- telling you about other providers or suppliers that supply information, goods or services that may be of interest or applicable to you;
- comply with our legal obligations (including to comply with any law or any lawful request of a law enforcement agency or government authority), resolve any disputes that we may have with any of our clients; or
- inform you of developments at Stephanie Crawford and other services, products or information that we can provide.

Generally, we will not direct market to anyone unless they have been given an opportunity to opt out of receiving future direct marketing communications. However, if we contact you for the purpose of direct marketing, without having obtained your consent first, because it is impracticable for us to do so, we will at that time provide you with the opportunity to decline any further marketing communications at no cost to you.

Sharing of your personal information

You acknowledge and agree that we may disclose your personal information to organisations or people outside of our business. These third parties are not authorised by us to use personal information for anything other than the purpose for which we supplied that information to them.

The third parties to whom we may disclose your personal information include:

- your other advisors, professionals and healthcare professionals that are providing services to you (which may include your school or other education provider);
- your parent or guardian;
- other businesses or organisations involved in our business, including Medicare, the NDIS, our business partners and third parties that referred or introduced you to us;
- external providers of services that we may use to operate our business and manage our business systems (for example, this may include file storage service providers, practice management system, database, CRM and mail and email service providers, marketing and e-commerce service providers, couriers, printers, providers of accounting and payment processing services (this may include Xero, Stripe and Medipass)), IT technicians who may need access when providing support and other professional service providers as required from time to time; and
- our professional advisors and agents.

Some of the personal information we collect about you may be held in practice management systems which hold data in Canada, the UK or the USA. We are transitioning away from these systems and will shortly use a system that holds all data in Australia. We are not otherwise likely to disclose information to overseas recipients unless it is with your consent, or the disclosure is required or authorised by law.

The privacy and collection practices of entities to whom we disclose personal information are governed by their own privacy policies and collection notices.

We will not otherwise disclose information about you unless the disclosure:

- is required or authorised by law; or
- you have consented to our disclosing the information about you.

Security of Personal Information

We will take reasonable precautions to protect your information from misuse, interference and loss, as well as from unauthorised access, modification or disclosure.

We will retain your information as required by law, and then take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed.

Quality of Personal Information and Accessing and Updating Information

We aim to ensure that your personal information is accurate, complete and up to date, but we need your help in making sure your personal information is correct. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and properly update the information to us to keep it true, accurate, current and complete.

Please email us of any changes to your name, address, phone number, or email address.

If you believe that the information we hold about you is inaccurate or incomplete, please contact us at the details below and we will use all reasonable efforts to correct the information.

If we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the information noting that you believe the information is inaccurate, incomplete, out of date.

You have rights to access your personal information held by us subject to the provisions of the Privacy Act. If you would like more information about this, please contact us at the details below.

Changes to this Privacy Policy

We reserve the right to make amendments to this Privacy Policy at any time for any reason. We will publish any updated Privacy Policy on our Website.

Change in control of Stephanie Crawford

If we sell or otherwise transfer part or the whole of our practice to another organisation (including in the course of a transaction like a restructure, sale, merger or acquisition or as part of a bankruptcy, dissolution, liquidation, administration, receivership or other form of insolvency), you agree that your personal information that is collected by Stephanie Crawford may be disclosed to a third party, prospective buyer, transferee or insolvency practitioner and that this is reasonable to enable that party to continue or manage the practice.

Complaints

If you have a complaint about our collection, use or disclosure of your personal information, or you wish to make a complaint about a breach of the APPs, please contact us at the details set out below.

In your complaint, please set out the details of your complaint and your contact details. We will contact you to acknowledge your request and ask for any other applicable information. We will then investigate the issue and advise you in writing of the outcome.

You can also make a complaint to the Office of the Australian Information Commissioner. Further information is available at www.oaic.gov.au.

Contacting us

If you have any questions about this Privacy Policy or our privacy practices, would like to make a complaint or request access to or correction of your personal information, please contact us using the following details:

- by **email** at stephanie.crawford@crawfordspeech.com.au;
- by **phone** on 0401 471 732; or
- by **post** at PO Box 2278, Blackburn South, Victoria 3130.