

# PRIVACY POLICY

## OUR PHILOSOPHY

Anna Rose Reeves t/a Ask a Dietitian (ABN 60 689 104 733) (we or us) are committed to protecting and respecting your privacy by handling all Personal Information securely and with care in accordance with the Australian Privacy Principles (the **APPs**) as set out in the *Privacy Act 1988* (Cth) (the **Act**). The APPs regulate the manner in which personal information is handled, from collection to use and disclosure, storage, accessibility and disposal.

This Privacy Policy explains how we collect, use and disclose your Personal Information and how to contact us if you have any further questions regarding our management of your personal information. Please read this policy carefully to ensure you understand our practices regarding the management of any personal information that you disclose to us.

## WHAT IS 'PERSONAL INFORMATION' AND 'SENSITIVE INFORMATION'?

**'Personal Information'** is any information or an opinion about you that identifies you or that could reasonably identify you. This could include information such as your name, contact details or date of birth.

**'Sensitive Information'** is any information or opinion about you which is health information or which relates to your racial or ethnic origin, political opinion, religious and/or philosophical beliefs, sexual preferences or practices or criminal record.

## WHAT INFORMATION DO WE COLLECT?

The Personal Information and Sensitive Information that you supply to us or which we obtain from third parties enables us to provide dietitian consultancy services to you. We only collect information that is reasonably necessary for the performance of our activities and functions so that we are able to provide you with the services you require.

The kind of Personal Information and Sensitive Information we collect and hold depends on the type of services provided to you, but will generally include basic personal contract information (eg. name, date of birth, address etc.) as well as other information that is deemed relevant. This will usually include the following:

1. contact details (name, postal address, email address etc.);
2. personal details including date of birth, gender, cultural identity, socioeconomic status;
3. information on your diet and health habits;
4. family background; and
5. health information and medical history.

If you do not provide us with the information required we may not be able to perform the services which you require us to provide.

## HOW WE COLLECT AND HOLD PERSONAL AND SENSITIVE INFORMATION

During the course of providing our services to you we will collect Personal Information and Sensitive Information from you by asking you verbally for that information or asking you to complete forms or documents necessary to enable us to provide you with the services. We may be provided with your Personal Information and Sensitive information from your referring practitioner or other third parties.

We will take reasonable steps to store information in a secure manner, protected by a combination of physical and technical measures. Personal Information and Sensitive Information that we store in hard copy is stored securely within our business premises or in other secure premises. Personal Information and Sensitive Information that we store electronically is stored in secure cloud services.

We will take all reasonable steps to protect the security of your Personal Information and Sensitive Information held by us. This includes appropriate technology to protect Personal Information and Sensitive Information stored electronically, as well as limiting the number of personnel who have access to information stored in hard copy format.

All Personal Information and Sensitive Information we no longer require will be destroyed or permanently de-identified, however, information will be retained for as long as the law requires.

Despite our reasonable efforts, we cannot guarantee that the security of your Personal Information and Sensitive Information will not be breached, therefore, to the fullest extent permitted by law, we disclaim all liability any responsibility for any damage you may suffer due to any loss, unauthorised access, misuse or alteration of any information we collect, except to the extent that our liability cannot be excluded by applicable laws and regulations which we are subject to.

## **HOW WE USE YOUR PERSONAL AND SENSITIVE INFORMATION**

We may use your Personal Information and Sensitive Information for the following purposes:

- to confirm your identity;
- to provide you with dietitian consultancy services;
- to contact you directly about our services;
- to share it with our related entities, subsidiaries or other specialist providers as required to perform functions on our behalf;
- for other purposes set out when your information is collected;
- for disclosures required by law, regulation or court order;
- to provide data to Government departments and agencies who provide funding for our services; and
- to conduct internal client research and assessment.

This includes us using this information to communicate with you about our services, internal administration, direct marketing and planning purposes. We will also use your personal information for purposes related to those described above which would be reasonably expected by you.

We will not use your Personal Information or Sensitive Information for purposes other than described above unless we have your consent or there are specified law enforcement or public health and safety reasons (as permitted under the Act).

## **TRANSFER OF PERSONAL AND SENSITIVE INFORMATION**

We do not outsource business functions to other organisations.

It is very unlikely that we will disclose your personal information to overseas recipients. If we transfer your Personal Information and/or Sensitive Information outside Australia, we will comply with requirements of the Act that relate to trans-border data flows. While we will not directly disclose your Personal Information and/or Sensitive Information to overseas recipients without your consent, the entities to which we may disclose your Personal Information and/or Sensitive Information may do so. We are unable to say what countries, if any, those recipients are likely to be located in.

## **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy discloses our current privacy practices. From time to time and in line with client expectations and legislative changes, this Privacy Policy will be reviewed, and, if appropriate, updated at any time without notice.

## **ACCESSING PERSONAL AND SENSITIVE INFORMATION WE HOLD**

You can access personal information we hold about you. Please contact our Privacy Officer to access any Personal Information or Sensitive Information we hold about you.

## HOW TO CHANGE ANY PERSONAL OR SENSITIVE INFORMATION WE HOLD ABOUT YOU

We will take reasonable steps to ensure that any Personal Information or Sensitive Information we collect, use or disclose is relevant, accurate, complete and up to date. Please contact our Privacy Officer (contact details below) if you believe your Personal Information or Sensitive Information we hold is inaccurate or incomplete. We can then take reasonable steps to correct this information.

## COMPLAINTS

If you have a complaint about the way we have dealt with your Personal Information or Sensitive Information we invite you to provide written details of your complaint to our Privacy Officer (contact details below).

Our Privacy Officer will contact you within 14 days of the date we receive the written details of your complaint to acknowledge that we have received it. Our Privacy Officer will then:

1. review the way we dealt with your Personal Information and/or Sensitive Information;
2. conduct an internal investigation (if necessary) into how your Personal Information and/or Sensitive Information came to be handled in the way that it was; and
3. provide a report to you within one month of the date we acknowledged receipt of your complaint.

If you believe we have breached the APPs you may also lodge a complaint with the Office of the Australian Information Commissioner.

## CONTACT US

Should you have any queries, complaints or comments about this Privacy Policy, please contact our Privacy Officer in writing by post or email at:

**Email:** [anna@askanapd.com](mailto:anna@askanapd.com)