

Palladium Private

MAKE THE CHANGE FOR GOOD

Privacy Policy

Our Commitment to Your Privacy

Palladium Healthcare Pty Ltd ACN 663 328 952 (“we”, “us”, “our”) developed and continues to provide certain programs to individuals as part of a solution for people suffering from depression, anxiety and addiction. We respect your privacy and believe that the responsible use of personal information collected by us is critical to our business objectives and reputation.

We are committed to complying with the Australian Privacy Principles (**APPs**) when collecting, using, disclosing, securing, and providing access to personal information. The APPs are contained in the Commonwealth Privacy Act 1988 (**the Privacy Act**) and govern how organisations such as ours handle personal information.

As part of our commitment to privacy, we have adopted this Privacy Policy. The contents of this Privacy Policy are subject to change and are not intended to create a contract between us and any individual or entity that provides us with personal information.

What is personal information?

For the purpose of the APPs:

- a) Personal information is any information, including any opinion, about an identified individual, or an individual who is reasonably identifiable:
 - i. Whether the information or opinion is true or not; and
 - ii. Whether the information or opinion is recorded in material form or not.
- b) Sensitive information is personal information, which is given a greater level of protection under the APPs, such as information about your health, criminal records, your religious beliefs or affiliations or political opinions. We only collect such information where we are permitted to do so under the APPs and if such information is necessary to provide our services to you or where we are required to collect this information by law.

How do we collect personal information?

We collect personal information in several different ways, including directly from you, through online dealings, through correspondence including application forms, and specific information request forms and from third parties such as your doctors, medical advisors, agents or representatives.

What personal information do we collect?

When you contact us, we may ask you to provide your contact details including your name, address, phone number and email address and details of your medical professional, medical records, information relating to your mental health and lifestyle, which enable us to provide the services or product you require, if any. We may also ask you to provide government identifiers such as your ABN or tax file number or other information reasonably required to enable us to effectively provide our services or products to you.

If you choose to share any information with us, the level and type of personal information we seek will vary dependent on the program you enroll in or the nature of your enquiry. We do not collect information we do not need.

Where it is lawful and reasonable to do so, you can remain anonymous or use a pseudonym if you wish, however it may reduce the type and quality of services we will be able to provide. If you do not wish for your personal information to be collected in a way anticipated by this letter or the Privacy Policy, Palladium Private may not be able to provide treatment services to you. You may request to be anonymous or to use a pseudonym, unless it is impracticable for Palladium Private, or if we are required or authorised by law to deal with identified individuals. In most cases it will not be possible for you to be anonymous or to use a pseudonym.

Why do we collection personal information?

The reason we collect personal information is so that we can provide you with our services, manage our relationship with you, communicate with you effectively and identify which of our services may meet your requirements, if any.

We may also collect personal information for marketing purposes, statistical analysis, dealing with enquiries or complaints, maintaining records and accounts payments.

We may also collect personal information for purposes of developing a mailing list. If we do so, when we use that personal information, we will offer people on the list an opportunity to be

removed from our mailing list, or to 'opt out' from receiving further contact be it by mail or electronically.

How is Personal Information used?

Your personal information is gathered as part of your access to and treatment through our services. This information is kept securely and, in the interests of your privacy, used only by authorized personnel such your therapists, and treating team.

The personal information collected from you by us is generally used to:

- provide you with our services (including use of sensitive information for establishing and maintaining your program and arranging your stay at Palladium Private);
- make contact or payment for supplies or services you may provide;
- help us develop, improve, manage and administer all of the services we provide to you;
- ensure that our business systems are functional and reliable;
- conduct marketing activities including market research;
- notify you of services, special offers, opportunities, products or benefits which we offer or any of our strategic partners offer;
- investigate, respond to or defend claims made against, or involving, us;
- meet our legal obligations.

Disclosure of Personal Information

All personal information gathered by the admissions team, therapists, or employees during the provision of the service will remain confidential. In the circumstances described below, personal information may be disclosed outside of our organisation.

a) Outsourcing

- Personal information collected by us may be disclosed to our affiliates, contractors or other business partners to support our customer relationship with you.
- If we disclose personal information to third party contractors under outsourcing or contracting arrangements, we take steps to ensure that those contractors:
 - comply with the APPs when they handle your personal information; and
 - are authorised only to use personal information in order to provide the services or to perform the functions required by us.

b) Disclosures required by law

- Personal information collected by us may be disclosed if it is required to do so by law, or

if the disclosure is permitted under the Privacy Act.

- We do not give, sell, rent or trade personal information to or with third parties for use in marketing or solicitation.

c) Overseas Transfer

- We use internet service providers that have servers located in Australia. However, we may in the future use internet service providers that may have servers located overseas, including cloud service providers. This means that your personal information supplied to us online, for example through email, our website or our social media sites, may sometimes be transferred overseas. If you elect to provide personal information to us through any of our online services you are deemed to consent to the possible overseas transfer of such information.
- Apart from the above we will only transfer your personal information overseas if:
 - we are required to do so by law;
 - we reasonably believe that the recipient will be required to uphold privacy principles which are similar to the APPs;
 - you have consented to the transfer;
 - it is not practical to obtain your consent or the transfer is for your benefit and your consent is likely to be given;
 - the transfer of the information is necessary for the performance of a contract between you and us; or
 - we have taken reasonable steps to ensure that your personal information will not be held, used or disclosed by the overseas recipient which does not comply with the Privacy Act and/or the APPs.

Therapeutic Team Collaboration

Palladium Private's therapeutic team will require ongoing team communication as part of delivering your program and managing risks. This is always done with respect and with the purpose of ensuring best outcomes for your program and therapeutic process. Generally specific details are withheld (ie the story) and symptoms and dynamics are more the focus. Please discuss any issues you may have with this.

Security

We take reasonable physical, electronic and administrative steps to ensure the security of personal information held by it from such risks as loss or unauthorised access, destruction, use, modification or disclosure.

Your personal information will be securely stored and managed and will not be used, sold, rented, or disclosed for any other purpose than that listed above. If unauthorised access, disclosure, or loss of a client's personal information occurs, Palladium Private will activate its data breach plan and use all reasonable endeavours to minimise any risk of consequential serious harm.

We do not share personal information with third parties except as necessary to provide our products or services or as required by law or other legal processes or with your consent, and we never sell your personal information.

Our personnel who have access to personal information have been trained to maintain the security of such information. Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that:

- (a) there are security and privacy limitations of the Internet which are beyond our control;
- (b) the security, integrity and privacy of any and all information and data exchanged between you and us through our website cannot be guaranteed; and
- (c) such information and data may be viewed or tampered with in transit by a third party.

We will apply this policy to all personal information we handle, whether collected online or otherwise. To the extent that this Privacy Policy applies to online privacy issues, it is to be read as forming part of the Terms & Conditions. Sometimes our website contains links to third party websites, for your convenience and information. When you access a third-party website, please understand that we are not responsible for the privacy practices of that site. We suggest that you review the privacy policies of each site you visit.

Access to Your Personal Information

At any stage you are entitled to access your personal information kept on file, subject to exceptions in the relevant legislation. The treating professional may discuss different possible forms of access. We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date.

Under the Privacy Act, you have a right to seek access to information which we hold about you (although there are some exceptions to this). You also have the right to ask us to correct information which is inaccurate, incomplete or out of date.

If you wish to exercise your right to seek access to the personal information that we hold about you, we ask that you contact us (details below), to explain how we will handle your access request. We will assume (unless you tell us otherwise) that your request relates to our current records about you. These current records will include personal information about you which is included in our databases and in paper files, and which may be used by us on a day-to-day basis.

To provide you with access to 'current' personal information, us would ordinarily provide you with a print-out of the relevant personal information from our databases, or with photocopies of records which are held only on paper files. If personal information about you (for example, your name & address details) is duplicated across different databases, we will generally provide you with one printout of this information, rather than multiple printouts. Ordinarily, we will not charge you for the cost of providing this type of access to these records.

For legal and administrative reasons, we may also store records containing personal information in our archives. In some circumstances, it may not be possible to access or delete all such records due to back up processes we adopt. However, you may still seek access to the records held by us which are not current records, but if you do so, we may charge you for the cost of providing this access.

If you are of the view that personal information about you is not accurate, complete or up to date, please update your record by providing us with your request for correction in writing (contact details below).

Our policy is to consider any requests for correction in a timely way.

Complaints

We recognise our responsibility for protecting the privacy of your personal information. If you have complaints about our administration of your personal information, please contact us at the contact details below. You may also use these contact details to communicate any concerns you may have regarding compliance with our Privacy Policy.

If you are not satisfied with how we handled your complaint, you can lodge a complaint with us or with the Office of the Australian Information Commissioner at:

Telephone 1300 363 992 (or +61 2 9284 9749 if calling from outside Australia).

TTY 133 677 (then ask for 1300 363 992)

Post GPO Box 5218 Sydney NSW 2001

Facsimile +61 2 9284 9666

Email enquiries@oaic.gov.au

Website www.oaic.gov.au

Contacting US

If you have any other questions or comments about this Privacy Policy, or if you wish to complain about how we have handled personal information about you, please contact our Privacy Officer, General Manager:

by telephone: +61754943495

by e-mail: office@palladium-private.com.au

by letter: Palladium Private Pty Ltd, PO Box 990 Maleny QLD 4552

Please include your name, address and/or email address when you contact us so that we can respond to you.

Changes to this Privacy Policy

We may change this Privacy Policy from time to time as required by us in our absolute discretion. If we do change this Privacy Policy, the changed version will be published on our websites and will be available by contacting us (details above).

Acceptance of this Policy

By continuing with your engagement with Palladium Private and supplying personal information you accept the terms set out in this privacy policy.