

ISN Privacy Policy

ISN Psychology Pty Ltd (ACN 607 683 303), **ISN Clinic Pty Ltd (ACN 607 683 321)** and **ISN Innovations Pty Ltd (ACN 88 641 431 423)**, its related entities (referred to as **ISN, we, us** or **our**) are committed to the protection of personal information that relates to you in accordance with the Australian Privacy Principles (**APPs**) as set out in the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Privacy Policy describes the manner in which we collect, hold and use information that is covered by the Privacy Act. It is not intended to cover categories of information that are not covered by the Privacy Act. If you wish to make any inquiries regarding this Privacy Policy, you should contact us in any of the ways specified in clause 15.

ISN Clinic is committed to the proper management and protection of any personal information or health information that is collected from you in accordance with the Privacy Act 1988 (Cth) and the Health Records Act 2001 (Vic) (**Privacy Acts**) including the Australian Privacy Principles (**APPs**) and Victorian Health Privacy Principles (**HPPs**).

References in this Privacy Policy to “you” are references to you as an individual and/or as a company, organisation or trust as applicable.

We may, from time to time, review and update this Privacy Policy including to take into account new laws, regulations and technology. All personal information held by us will be governed by our most recent Privacy Policy, posted on our websites (www.isn.edu.au & www.isnclinic.com.au & isninnovations.com.au) (**Website**). Our most recent Privacy Policy will apply to our collection, use and disclosure of Personal Information.

You accept this Privacy Policy and expressly consent to our collection, use and disclosure of your Personal Information as described in this Privacy Policy by using our Website, our products and services or by other communications with us.

1. What information is covered by the Privacy Act?

“**Personal Information**” is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether recorded in a material form or not.

“**Sensitive Information**” is Personal Information about an individual that includes health information, genetic information, biometric information or templates, or personal information that is also information or an opinion about an individual's race or ethnicity, their religious, political or philosophical beliefs, opinions or affiliations, their sexual orientation or criminal record.

For the purposes of this Privacy Policy, references to Personal Information are references to Personal Information and, where applicable, Sensitive Information.

2. What kind of information do we collect and hold?

We may collect and hold Personal Information about you such as your name, gender, date of birth, contact details (including your address, phone numbers and emails, whether personal or for work), academic information, health or medical information (where applicable to support you in respect to psychological services, of disability or applications for special consideration), psychological assessment information (where applicable as part of our interview processes), financial information, payment details, bank account details, tax file number, services information and preferences. We may also collect Personal Information that you submit to us via the Website, including when you apply to enrol in a course or contact us for an appointment.

3. **Why do we collect Personal Information?**

3.1 **Why do we collect your information?**

We collect Personal Information from students, clients, employees, contractors and other individuals that is reasonably necessary for one or more of our functions or activities, including: in order to allow us to conduct our teaching functions, research functions, clinical functions and business functions, when you request information about us or our services, to meet any regulatory requirements which apply to our teaching and research activities, to promote our courses and services and to conduct employee related activities.

3.2 **How you may deal with us**

You have the option to deal with us anonymously or by using a pseudonym. However you acknowledge that where this is impractical (for example when you enter into a contract with us) or where the law or a court order provides otherwise, we are not required to provide these options to you.

If you choose not to provide your Personal Information to us, we may not be able to undertake certain activities for you such as providing you with requested information, products or services.

4. **Collecting Personal Information**

4.1 **When and how do we collect your information?**

We collect Personal Information directly from you when you: visit our Website, apply for a course of study, request our services, request information about us or our courses or services, provide feedback, respond to a survey, change your content or email preferences, enter into an agreement or contract with us, fill in a form or a request for services (including an application for a student account with us or an application to participate in research or clinical activities), fill in a form on our Website (including an application for enrolment or a registration form to register as a member), become a student, client or an employee of ISN, or contact us by telephone, facsimile, email, post or in person.

If you provide Personal Information about other individuals to us, you must ensure that you have informed those individuals that you are providing their Personal Information to us and that you have obtained their consent and advised them of our Privacy Policy.

4.2 **Do we collect information about you in other ways?**

We may also collect Personal Information about you via third parties including from our online student resources providers, suppliers, merchants, direct mail, events or online marketing.

In some circumstances we may receive Personal Information that we have not requested. If this occurs, we will comply with our obligations under the Privacy Act. You acknowledge that we may de-identify and/or destroy this information unless we are required to keep it by law.

5. **Information collected via our Website**

5.1 **Website terms of use**

This Privacy Policy together with our Website usage terms and conditions (**Website Terms of Use**) govern how we use, collect or disclose Personal Information provided

on our Website. By using the Website you agree to the terms and conditions contained in this Privacy Policy and the Website Terms of Use. Both the Privacy Policy and the Website Terms of Use are posted on the Website (www.isn.edu.au).

We will not collect any Personal Information about users of our Website except when they knowingly provide it or as otherwise described below. For example, we may collect Personal Information from users of the Website when they:

- (a) apply to enrol in a course online;
- (b) complete an online form, including registering to receive updates, promotional material or other information; and/or
- (c) otherwise correspond with us.

5.2 **Click Stream Data**

When you visit and browse our Website, our Website host may collect Personal Information for statistical, reporting and maintenance purposes. Subject to clause 7.2, the Personal Information collected by our Website host will not be used to identify you. The information may include:

- (a) the type of browser and system you are using;
- (b) the address of the website you have come from and move to after your visit;
- (c) the number of users visiting our Website and the number of pages viewed;
- (d) the date, time and duration of a visit;
- (e) the IP address of your computer; or
- (f) the path taken through our Website.

Our Website host uses this information to administer and improve the performance of our Website, including to assist with the diagnosis of and to provide support for any issues with our Website or services.

5.3 **Cookies**

Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns.

If you access our Website, a cookie is downloaded onto your computer's hard drive when you first log on to our Website. We use cookies to allow us to personalise your browsing and online shopping experience on our Website, including to remember any items in your shopping cart. You can adjust your internet browser to disable cookies, however we may not be able to provide you with all the service or functionality you require on our Website if you choose to do so.

5.4 **Web Beacons**

Web beacons are images that originate from a third party site to track visitor activities. We may use web beacons to collect aggregate data and provide this information to our Website host to administer and improve the performance of our Website.

5.5 Advertising

We may use Google and/or other third-party service providers to serve ads on our behalf across the Internet and sometimes on our Website. They may collect anonymous information about your visits to our Website (not including your name, address, email address or telephone number), and your interaction with our products and services. They may also use information about your visits to the Website and other websites to target advertisements for goods and services in order to provide more relevant advertisements about goods and services of interest to you.

5.6 Links to external websites

If you follow any links to external websites from our Website, the Privacy Policy and the Website Terms of Use will not apply to those websites which may have their own policies relating to privacy and data collection and website usage. If you choose to access any linked website or to provide any Personal Information on such websites you should review their policies and terms of use to learn more about how they may use your Personal Information. We are not responsible for and will not be liable for the operations or policies of any external website.

6. How we use Personal Information?

6.1 How we use the Personal Information we collect about you?

We use the Personal Information we collect about you for our teaching, research and business functions and activities, which may include the following:

- (a) to provide you with information, products or services you have requested, including where we engage third parties to provide you with goods or services on our behalf;
- (b) to provide you with a student account and student services, including evaluating and processing your application for a student account;
- (c) to manage your student account including access to online student services, learning tools, library and research services;
- (d) to communicate with you including to provide and promote our services to you and to communicate with you via SMS or email newsletters;
- (e) to personalise and customise your experiences on our Website;
- (f) to help us research the needs of our students;
- (g) to conduct research for the purposes of improving existing courses or services or creating new courses or services;
- (h) to provide you with ongoing information about us and our activities;
- (i) to allow us to provide third party information and services in which we believe you may be interested;
- (j) to use aggregated or de-identified information for the purposes of data analysis, research and reporting;
- (k) to comply with regulatory or other legal requirements;
- (l) for purposes related to the employment of our personnel and providing internal services to our staff; and

- (m) for any other use required or permitted by law or any other purpose communicated to you at the time that the Personal Information was collected or for which you provided your consent.

We manage and protect the privacy of your personal information in the practice as a health professional through ISN Clinic, which may include the following:

- (a) collecting and recording of information provided by you, or other you have consented us to contact which is pertinent to the provision of health and wellbeing services provided.
- (b) recording notes during your therapy
- (c) presenting and discussing your case with peers and practitioners. This is done in a way that ensures complete anonymity while maintaining high standards of practice including through supervision as is required by the Code of Ethics of the Australian Psychological Society.
- (d) holding your records for at least seven years or as otherwise required

We may use your Personal Information for a secondary purpose if that secondary purpose is related to the purposes listed in this clause 6.1, if we have your consent or if otherwise provided for under the Privacy Act.

Generally, we will only collect and use your Personal Information in accordance with this Privacy Policy. In the event that we collect or use Personal Information in ways other than as stated in this Privacy Policy, we will ensure that we do so in accordance with the Privacy Act.

6.2 **Direct marketing**

We may use your Personal Information to provide you with direct marketing materials if you would reasonably expect us to or if you consent to receive direct marketing materials. We will seek your consent to provide you with direct marketing materials if we have obtained your Personal Information from a third party. Direct marketing material may include promotional material about us or the products or services we offer.

You may opt out of receiving direct marketing material by contacting us in any of the ways specified in the direct marketing materials or as set out in clause 15.

7. **When do we disclose Personal Information?**

7.1 **Who do we disclose your Personal Information to?**

Depending on the nature of your relationship with us, we may disclose your Personal Information to our shareholders, officers and employees, other businesses within our group of companies, service providers who assist us in our teaching, research and business operations (including third party service providers based overseas), government agencies, parties involved in the purchase or sale of any of our businesses, other third parties, (including parties that we engage to provide you with courses, teaching and research services on our behalf or who are connected with or involved in our relationship with you), or otherwise as required by law.

7.2 **Service providers**

We may also disclose your Personal Information to our Website host or service providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner. To

the extent that we do share your Personal Information with a service provider, we would only do so if that party has agreed to comply with our privacy standards as described in this Privacy Policy.

We may also share non-personal, de-identified and aggregated information for research or promotional purposes in connection with providing requested information or services to you, or for the purpose of improving our services. We will not sell your Personal Information to third parties for marketing purposes.

Unless otherwise specified in this Privacy Policy, we or our Website host will not disclose any of your Personal Information to any other organisation unless the disclosure is required by law, is otherwise permitted by the Privacy Act, or is with your consent.

8. **Disclosure of your Personal Information overseas**

Your Personal Information may be disclosed outside of Australia to an entity in a foreign country, including entities in which we have an ownership interest or to third party service providers (**Overseas Entities**). It is possible that the Overseas Entities may be subject to foreign laws that do not provide the same level of protection of information as in Australia. We take reasonable steps to ensure that these overseas entities do not breach the APPs and that they are obliged to protect the privacy and security of your Personal Information and use it only for the purpose for which it is disclosed.

9. **Employee Records**

Employee records are not generally subject to the Privacy Act. As such this Privacy Policy may not apply to the handling of employee related information. Please contact us directly for information about our employee information handling practices.

10. **Notifiable Data Breaches scheme**

The Notifiable Data Breaches scheme (NDB scheme) in part IIIC of the Privacy Act sets out the obligations for notifying affected individuals, and the Australian Information Commissioner (**Commissioner**), about a data breach which is likely to result in serious harm.

Where serious harm to affected individuals is likely, we will notify those individuals and the Commissioner in accordance with our legal obligations. You may contact our Privacy Officer via the contact details below should you require additional information.

11. **Storage and security of Personal Information held by us**

We will take reasonable steps to protect your Personal Information from misuse, interference and loss and from unauthorised access, modification or disclosure.

We aim to keep your Personal Information secure and up to date. We will comply with our obligations under the Privacy Act in relation to any Personal Information that we handle, including information which is held on our computer systems.

Personal Information that is held by us in hard copy is stored securely on our premises and is only disclosed or used for the purposes described in this Privacy Policy.

12. **Updating and correcting your Personal Information**

We will take reasonable steps to ensure that the Personal Information that we hold is accurate, up-to-date and complete. You can update your Personal Information at any time by contacting us in any of the ways specified in clause 15. We welcome any changes to your Personal Information so as to keep our records up to date.

13. **How long will we keep your Personal Information?**

We will keep your Personal Information only for as long as required by Australian law for the purposes of conducting our teaching, research and for our business purposes.

Where we no longer need to keep your Personal Information in accordance with this clause 13, we will take reasonable steps to destroy or de-identify your Personal Information.

If you wish to have your Personal Information destroyed or de-identified, please let us know and we will take reasonable steps to do so (unless we need to keep it for legal, auditing or internal risk management reasons, or as otherwise required by law).

14. **Finding out what Personal Information we hold about you**

You are entitled to access Personal Information that we hold about you. If you request access to your Personal Information, we will grant your request unless providing you with access would unreasonably impact upon the privacy of others or is not otherwise permitted under the Australian Privacy Principles or at law. If we refuse your request to access your Personal Information, we will provide you with written reasons for the refusal.

A request for access can be made by contacting us in any of the ways specified in clause 15.

15. **How to contact us and more information?**

If you feel that your privacy has not been respected or that we have conducted ourselves inconsistently with this Privacy Policy, the Australian Privacy Principles, a registered APP Code and/or the Privacy Act in respect of your Personal Information, or for any other queries, problems, complaints or communication in relation to this Privacy Policy, please contact us in any of the following ways:

15.1 **By email:** reception@isn.edu.au

15.2 **By post:** Att: Privacy Officer
 ISN Psychology Pty Ltd
 R15, 443 Upper Heidelberg Road,
 Ivanhoe VIC 3079

You can find out more information about the Privacy Act and the Australian Privacy Principles from the Office of the Australian Information Commissioner. The Information Commissioner may be contacted at www.oaic.gov.au or by email at enquiries@oaic.gov.au.

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