

Privacy Policy for Management of Personal Information

This document describes the privacy policy of Full Potential Psychology for the management of clients' personal information. The psychological service provided is bound by the legal requirements of the Australian Privacy Principles set out in the Privacy Act 1988 (Cth).

Kinds of information that Full Potential Psychology holds

The kind of information that we hold about you depends on your relationship with Full Potential Psychology.

- Client information

The information on each file includes personal information such as name, address, contact phone numbers, medical history, billing information and health information collected as part of providing the psychological service.

If a client chooses to participate in Legend Land therapy sessions, we collect the client's Universally Unique Identifiers (UUID), information regarding character appearances or 'skins', Minecraft user account authentication, user display names and miscellaneous statistics from Minecraft (Microsoft).

If a client uses Legend Land between sessions, we will collect information about that use. This might include minigames and player statistics during the sessions, rewards obtained during the game, email if the client enters it, player progress during the game and any data the client chooses to enter into the portal.

- Information about parents/guardians of clients

The information held on parents/guardians includes name, relationship to client and contact details, billing information.

We will collect information that a client's parent/guardian enters into the Legend Land portal, including their registration and log-in details, information they record in portal including email address and updates to reward charts.

- Information about prospective employees

The information held on perspective employees includes resumes, cover letters, qualifications, contact details and information collected from referees.

- Information about service providers

The information held about contractors includes resumes, cover letters, qualifications and contact details, identification, bank details for payment.

How clients' personal information is collected.

A client's personal information is collected in a number of ways during psychological



consultation with Full Potential Psychology, including when the client provides information directly to Full Potential Psychology using hardcopy and electronic forms, correspondence via email, when the client interacts directly with Full Potential Psychology employees such as the receptionist, and when other health practitioners provide personal information to Full Potential Psychology, via referrals, correspondence and medical reports.

We collect information directly from clients during our face-to-face, telehealth or online Legend Land therapy sessions. We also collect information a client or their parent/guardian enters in Legend Land, and limited information from the client's linked Minecraft account.

Purposes of collecting, holding, using and disclosing personal information.

A client's personal information (including information provided by the client's parent/guardian) is gathered and used for the purpose of providing psychological services to the client, which includes assessing, diagnosing, and treating a client's presenting issue. The personal information is retained in order to document what happens during sessions and enables the psychologist to provide a relevant and informed psychological service.

We use information provided by prospective employees to assess an application for employment, including by obtaining comments from the identified referees.

We use information from our service providers to manage our business.

Consequence of not providing personal information.

If the client does not wish for their personal information to be collected in a way anticipated by this Privacy Policy, Full Potential Psychology may not be in a position to provide the psychological service to the client or may not provide relevant services.

We may not be able to assess an application for employment if it does not include relevant information.

We may not be able to engage service providers who do not provide us with information necessary to manage our business.

Disclosure of personal information

All personal information gathered by the psychologist during the provision of the psychological service will remain confidential except when:

1. it is disclosed to your private health insurer, Medicare, or other payor for payment of your account.
2. it is subpoenaed by a court, or disclosure is otherwise required or authorised by law; or
3. failure to disclose the information would in the reasonable belief of the Full Potential Psychology place you or another person at serious risk to life, health, or safety; or
4. your prior approval has been obtained to:
 - a. provide a written report to another professional or agency. e.g., a GP or a lawyer; or



- b. discuss the material with another person, eg. a parent, employer, health provider or third-party funder; or
 - c. provide another person, e.g., parent or guardian with access to the Full Potential Psychology parent portal to view your information in the reward server, update your reward charts, download worksheets and record their own data.
 - d. disclose the information in another way; or
 - e. disclose to another professional or agency (e.g., your GP) and disclosure of your personal information to that third party is for a purpose which is directly related to the primary purpose for which your personal information was collected.
5. there are incidental disclosures associated with the technology you agree to use in your therapy sessions, namely:

Telehealth

Full Potential Psychology uses Zoom to provide telehealth services. Zoom is encrypted and may store your personal data to provide this service. Zoom's privacy policy can be found at <https://zoom.us/privacy>.

We suggest that you use a private room for a telehealth consultation, use a private email address and take steps to protect your psychological information in digital format (such as homework).

Minecraft Server Hosting

Full Potential Psychology uses dedicated private server with OVH and the game Minecraft to host and play Minecraft online for some sessions. In order to access this server, Full Potential Psychology will be required to enter your unique Minecraft user ID into OVH in order to access the Legend Land server. Further information regarding OVH's privacy policy can be found here: <https://www.ovh.com/ca/en/support/privacy-policy.xml>

You may choose not to register for Minecraft or not provide us with your Minecraft user ID, but this will mean that you will not be able to access Legend Land.

You are not required to enter any information into Minecraft or Legend Land as part of our therapy sessions as we will be online with you using telehealth at the same time. Any information that you type into Legend Land during or between our sessions will be collected by Minecraft and will be outside the control of Full Potential Psychology.

Minecraft is owned by Microsoft. Further information regarding Minecraft's privacy policy, including how they use and disclose information, can be found here: <https://account.mojang.com/terms#privacy>

Full Potential Psychology does not disclose clients' personal information to overseas recipients, unless the client consents or such disclosure is otherwise required by law.

In the event that unauthorised access, disclosure or loss of a client's personal information occurs, Full Potential Psychology will activate its data breach plan and use all reasonable endeavours to minimise any risk of consequential serious harm.



Requests for access and correction to client information

You may request to access and/or correct the personal information that we hold about you.

For clients, the psychologist may discuss the contents of the file with the client and/or give the client a copy, subject to the exceptions in the Privacy Act 1988 (Cth).

If we are satisfied that personal information that we hold is inaccurate, out of date or incomplete, reasonable steps will be taken in the circumstances to ensure that this information is corrected.

All requests by clients, parents/guardians, perspective employees and contractors for access to or correction of personal information held about them should be lodged with Full Potential Psychology. These requests will be responded to in writing within 30 days, and an appointment will be made if necessary, for clarification purposes.

Concerns

If you have a concern about the management of your personal information, you may inform Full Potential Psychology and we will investigate your complaint and respond to you within 30 days.

If we are unable to resolve your concern, you may lodge a formal complaint with the Office of the Australian Information Commissioner by phone on 1300 363 992, online at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> or by post to: Office of the Australian Information Commissioner, GPO Box 5218, Sydney, NSW 2001.