

Winn Clinic Privacy Policy

Introduction

The Winn Clinic is operated under the auspices of the Sydney Institute for Psychoanalysis ABN 63 000 096 837 ("SIP"). The Winn Clinic's service ("**Service**") is provided by volunteers who are members of the Sydney Institute for Psychoanalysis.

This Privacy Policy applies to the SIP and its volunteers ("**we**", "**us**") in relation to their operation of the Winn Clinic and explains how we handle personal information and comply with the requirements of applicable privacy laws, including the *Privacy Act 1988 (Cth)* ("**Privacy Laws**"). If you have further questions relating to this policy, please contact us at the details below.

We recognise the importance of your privacy, and that you have a right to control how your personal information is collected and used. This Privacy Policy seeks to address any concerns you may have about the handling of your personal information.

1. What is Personal Information?

- 1.1 "**Personal information**" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.
- 1.2 The types of information we may collect about you will depend on the circumstances in which that information is collected. The main types of information that we collect are listed below.

2. Collection of personal information

- 2.1 We collect personal information about existing and prospective patients, suppliers, contractors, practitioners, volunteers, donors and other individuals for various purposes listed below.
- 2.2 The types of personal information we will collect about you will depend on the circumstances in which that information is collected. It may include:
 - (a) contact details (e.g. your name, address, email, phone and facsimile details);
 - (b) if you are a donor, details of your donation amount and payment method;
 - (c) if you are a volunteer or practitioner, information which you provide as part of your application or other correspondence with us (e.g. your qualifications, professional registrations and prior experience);
 - (d) if you are a patient or prospective patient of the Winn Clinic:
 - (i) information about your circumstances (e.g. your age and gender; your health and medical conditions; your family and work situation; your financial situation and lifestyle) which may be relevant to evaluating your situation and suitability for initial assessment ("**Consultation**") or subsequent referral for treatment ("**Referral**");

- (ii) information about any past and present treatment you may have received and details of your doctor or other health practitioners with whom you have been in contact; and
- (iii) information regarding your contacts with us and practitioners in connection with Consultations and Referrals; and
- (e) statistical information regarding the use of the Winn Clinic website at www.thewinnclinic.net.au (the "Site"), including Site users' IP addresses and the dates and times of visits.

3. How we collect personal information

3.1 The main ways in which we may collect personal information are as follows:

- (a) from you: we collect personal information which you provide to us (for example, on a completed application form, while in contact with one of our volunteers by email or telephone, or otherwise);
- (b) if you are a patient of the Winn Clinic, from practitioners, as follows:
 - (i) the practitioner allocated to you for Consultation will provide us with a report and recommendations following your Consultation, which will contain personal information about you, which we use to determine whether and what kind of Referral may be appropriate;
 - (ii) if you are Referred to a practitioner for treatment, that practitioner will report back to us to confirm whether they are providing you with treatment and, if not, to provide any recommendations they have for alternative treatment; and
 - (iii) if you have provided us with contact details for a practitioner who has previously been treating you, we may also contact that practitioner to obtain further information about your situation (e.g. via correspondence with your GP).
- (c) on the Site: when you make a donation, when you ask to be contacted by one of our volunteers, and also via session cookies (see section 9 below).

3.2 If you do not provide us with your personal information when requested, this may limit the assistance we are able to provide you. For example, we may not have sufficient information to be able to place you with a practitioner for Consultation, or a practitioner may not have sufficient information to be able to make an informed decision about the most appropriate course of treatment to address your situation, meaning that we may not be able to make a Referral.

3.3 Where practicable, we will collect personal information directly from you. However, as mentioned above, if you are a patient, we will collect information from practitioners responsible for you. If a patient is under 18, we will also collect information about that patient from the parent, guardian or responsible carer who completes their application form. We will not seek to collect personal information about you from third parties in other circumstances unless we have your consent to do so. If we receive information about you from anyone else, we will take reasonable steps to ensure you are aware that we have collected personal information about you and the circumstances of the collection.

4. Sensitive information

- 4.1 In order to provide our services, we will collect personal information, such as health information or other information about your personal circumstances, that is designated as "sensitive information" under Australian Privacy Laws.
- 4.2 As noted above, we collect such information in order to verify eligibility to receive our services and to help us to assess which type of treatment will suit you best. We need to collect such information in order to make an informed decision about whether and how best to refer you for treatment.
- 4.3 We will only collect any such sensitive information when we have obtained your consent to do so (or, if you are a minor, the consent of your parent, guardian or responsible carer) or where the person providing the sensitive information to us (e.g. a practitioner) has confirmed that he or she has obtained your consent to do so.
- 4.4 In providing any consents to the collection or handling of personal information (including sensitive information), you consent to us collecting, transferring, disclosing, storing, and processing the information you provide in accordance with this Privacy Policy and the terms of those consents.

5. Use and disclosure of personal information

General

- 5.1 We will only use and disclose your personal information in accordance with Privacy Laws and this Privacy Policy.
- 5.2 Our main purposes for collecting, holding, using and disclosing personal information are the following:
- (a) to provide you with services you have requested;
 - (b) to respond to your enquiries about our services and communicate with you;
 - (c) to verify your eligibility for the Service;
 - (d) to find and liaise with a practitioner who is able to offer you a Consultation;
 - (e) following Consultation, to assess your suitability for a Referral for treatment and, where we consider appropriate, to make that Referral;
 - (f) to notify your GP and other practitioners responsible for your care regarding your Consultations and (where applicable) Referral; and
 - (g) to comply with legal and policy requirements including in relation to medical ethical guidance and standards, quality assurance and complaint handling.
- 5.3 We generally explain at the time we collect personal information how we will use or disclose that information. We will only use or disclose personal information for a purpose other than for which it was collected or a related purpose if you have consented to such different use or disclosure or such use or disclosure is otherwise allowed by Privacy Laws.

Sharing of patient information

- 5.4 In carrying out our activities, it may be necessary to share information about patients of the Winn Clinic with persons and organisations that provide services to us (e.g.,

our volunteers or practitioners working with the Winn Clinic). We do not otherwise routinely disclose your personal information to any other organisation unless:

- (a) we believe it is necessary to provide you with a service which you have requested;
- (b) it is necessary to protect the rights, property or personal safety of any person (including you, our volunteers and any member of the public) or our interests;
- (c) to comply with our legal obligations (e.g. to notify public health authorities of certain infectious diseases; to notify our insurers of certain matters; or to comply with mandatory requirements of law enforcement authorities); or
- (d) you have provided your consent.

Sharing of information about other people

- 5.5 We use a range of service providers to help us maximise the quality and efficiency of our services and our business operations. This means that individuals and organisations outside of the Winn Clinic, such as practitioners involved in Consultations and Referrals, will sometimes have access to personal information held by us and may use it on behalf of us. We require our service providers to adhere to strict privacy guidelines and not to keep this information or use it for any unauthorised purposes.

6. Security of Information

- 6.1 We care about the security of your information. We take reasonable steps to protect personal information we hold about you from misuse, interference and loss and from unauthorised access, modification or disclosure. These steps may include limiting access to hard copy information we hold about you and requiring those who use your personal information in order to provide the Service (including practitioners and volunteers) to take reasonable steps to keep personal information secure. In addition, information we hold about patients of the Winn Clinic is hosted by a cloud service provider in password protected storage, and we limit access to this storage to those people who need to know that information for the purposes of operating the Winn Clinic. As mental health professionals, practitioners working with the Winn Clinic and our volunteers are also subject to ethical and professional standards, which include duties of confidentiality towards their patients.

7. Retention of information

- 7.1 When we no longer need to use your information, we will take steps to properly de-identify or destroy it, except to the extent we need to retain it for legal reasons.

8. Disclosure of information outside Australia

- 8.1 Information stored by our cloud service provider may be held anywhere in the world. However, this does not change our commitments to safeguard your privacy and we will comply with all Privacy Laws which apply to your personal information. We do not otherwise disclose, transfer, hold or access your personal information in or to locations outside Australia, except where you are located overseas, in which case we may disclose, transfer, hold or access your personal information in or to the country where you are located.

9. Our Site privacy practices

- 9.1 We sometimes use cookie technology on the Site to provide information and services to Site visitors. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Most web browsers are set to accept cookies. Cookies are useful to estimate our number of visitors and determine overall traffic patterns through the Site. Our Site provider uses session cookies stored on your machine to perform hit counting and similar analysis of our Site traffic, and also to provide Site functionality.
- 9.2 If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the services on the Site.

10. Links to other websites

- 10.1 The Site may contain hyperlinks to websites operated by parties other than the Winn Clinic. The Winn Clinic does not control such websites and is not responsible for their content or practices engaged in by their operators, nor are such websites subject to our Privacy Policy. Before disclosing your personal information on any other website, we recommend that you examine the terms of use and Privacy Policy of all external websites that you visit.

11. Employee information

- 11.1 This Privacy Policy does not apply to our handling of employee records. For information about our practices relating to employee information please contact us at the contact details below.

12. Contacting us regarding the information we keep about you

- 12.1 You may contact us by emailing info@thewinnclinic.net, or by writing to us at the following postal address:

Clinic Director
The Winn Clinic
c/o Sydney Institute for Psychoanalysis
5 Penshurst Street
WILLOUGHBY NSW 2068.

- 12.2 If you want to know exactly what personal information we hold about you, you may request access to your record by contacting us at the above address. Our file of your information will usually be made available to you within 14 days.
- 12.3 If you wish to change personal information that we hold about you because it is inaccurate or out of date, please contact us and we will amend our records. If you request to have your personal information deleted, we will take all reasonable steps to delete it unless we need to keep it for legal reasons.
- 12.4 If you have any concerns or complaints about how we handle your personal information, or if you have any questions about this policy, please contact us at the above address. We will investigate your complaint and will use reasonable endeavours to respond to you in writing in a timely manner. If we fail to respond to your complaint within 30 days of receiving it in writing or if you are dissatisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner ("OAIC"). Details of how to contact the OAIC are located at www.oaic.gov.au.

12.5 Please include your full name and address, and full details of your enquiry, request or complaint in all messages to us.

13. Future changes

13.1 The Winn Clinic is a pioneering initiative to help individuals find the right treatment to help them with their difficulties. Over time, aspects of the Winn Clinic's operations may change. This may require our policies to be reviewed and revised. We reserve the right to change this Privacy Policy at any time and notify you by posting an updated version on the Site. Please check the Site regularly for changes. Where updates or modifications affect how we handle your sensitive information, we will seek your consent as required by law.