



PRIVACY POLICY

Life Solutions OT

This Privacy Policy explains how Life Solutions OT collects, holds, uses, and discloses personal information, in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), and, where relevant, the Health Records and Information Privacy Act 2002 (NSW). As a provider of health services, Life Solutions OT is bound by these obligations regardless of business size or turnover.

1. Collection of Personal Information

Life Solutions OT collects personal information through various means, including face-to-face interactions, phone calls, electronic communication (e.g. email), and referrals. Information is sourced from you, health professionals, funding bodies, and, if applicable, your guardian or nominee. This information is necessary for delivering occupational therapy services.

Information collected includes (but is not limited to) name, date of birth, addresses, contact details, medical history and relevant health information, medications, social history, NDIS plan details, and relevant connections with other health and wellbeing service providers.

2. How We Use Your Information

Life Solutions OT uses personal information to deliver and coordinate your occupational therapy services, prepare clinical documentation and reports, communicate with you and your support network, and meet our legal and professional obligations. Personal information is stored electronically using secure cloud-based software, including systems used for client management, scheduling, and document storage, as described further in clause 3. Hard copy documents and photographs are scanned, converted, and then securely destroyed. Life Solutions OT retains personal information for as long as necessary to fulfil the purposes for which it was collected, comply with legal and professional record-keeping obligations, and resolve any disputes. When information is no longer required, it will be securely destroyed or de-identified.

3. Use of Digital Systems and AI-Assisted Tools

Life Solutions OT uses digital systems, including AI-assisted software and third-party platforms, to support administrative functions such as client management, clinical documentation, report writing, document storage, and communication.

Client Management System: we use a cloud-based practice management platform to manage bookings, client records, and related administrative information. This platform stores information on servers located in Australia. The platform also offers optional AI-assisted features powered by a third-party AI provider located in the United States; Life Solutions OT does not currently use these AI-assisted features in connection with your personal information. If this changes, this Privacy Policy will be updated to reflect the change, in accordance with clause 13.

Document Storage: client documents and files are stored using a cloud-based file storage platform provided by a global technology company. We understand relevant data is generally stored within Australian data centres for Australian-based accounts, although the provider's global infrastructure means this cannot be guaranteed in every circumstance.

Clinical Report Drafting: we use an Australian-hosted software platform designed for occupational therapists to assist with drafting clinical reports and case notes. This platform stores draft clinical information in encrypted form on servers located in Australia. When a report is actively generated, the relevant clinical information is transmitted to a third-party AI provider located in the United States, solely to produce draft report text. Under our arrangements with these providers, this information is not used to train AI models and is not retained beyond what is required to process the request.

General AI Assistance: we may also use AI assistant software provided by a third party located in the United States for general administrative and business tasks. Where this occurs, information entered is limited to minimal, non-identifying or minimally identifying details (such as a client's first name only); full names, addresses, health information, and other identifying details are not entered.

Where practicable, information provided to these tools is de-identified or limited to the minimum necessary. All clinical reasoning, decision-making, and recommendations remain the responsibility of, and are reviewed and approved by, Life Solutions OT. No decision about your supports, funding, eligibility, or care is made by an automated system. While reasonable steps are taken to protect personal information in accordance with applicable privacy legislation, the use of third-party and AI systems carries inherent data security risks that cannot be entirely eliminated. By engaging Life Solutions OT's services, you consent to the use of these tools as part of service delivery, as set out further in our service agreement.

4. Overseas Disclosure

As described in clause 3, clinical information may be disclosed to a third-party AI provider located in the United States at the point a report is generated using AI-assisted drafting tools, and limited, minimally identifying information (such as a client's first name) may also be disclosed to a third-party AI provider located in the United States when AI assistant software is used directly for administrative tasks. This is an overseas disclosure for the purposes of Australian Privacy Principle 8.1. Life Solutions OT takes reasonable steps to ensure that any third party handling personal information on our behalf, including overseas recipients, does so consistently with the Australian Privacy Principles, including by using service providers who maintain their own privacy and security commitments.

Our client management platform is Australian-hosted and stores your information on servers in Australia. Although this platform includes optional AI-assisted features that involve technology provided by a United States company, Life Solutions OT does not currently use those features in connection with your personal information, and no overseas disclosure currently arises from this use on that basis.

Our document storage provider, which we use for client documents, is a global technology company. While we understand relevant data is generally stored within Australian data centres for Australian-based accounts, the provider's international infrastructure means personal

information could, in limited circumstances, be handled outside Australia. Outside of the disclosures described in this clause, your personal information is otherwise stored and held within Australia.

5. Information Sharing

We do not sell, trade, or otherwise transfer your personal information to third parties without your consent, except as described below:

- **Service Providers:** we may share your information with third-party service providers who assist us in providing services, including the digital and AI-assisted tools described in clause 3.
- **Subcontracted Practitioners:** where your services are delivered in whole or in part by a subcontracted occupational therapist engaged by Life Solutions OT, your relevant information is shared with that practitioner for the purpose of delivering your service. Subcontractors are bound by confidentiality and privacy obligations in their agreement with Life Solutions OT.
- **Legal Compliance:** we may disclose your information to comply with applicable laws, regulations, or legal processes.

6. Access to and Correction of Information About You

Upon written request, Life Solutions OT provides access to the information held about you, and will correct or update it as necessary. Any refusal to provide access will be accompanied by reasons, in accordance with the Australian Privacy Principles.

7. Keeping Your Personal Information Up to Date

Life Solutions OT endeavours to maintain accurate, complete, and up-to-date personal information. If inaccuracies are identified, reasonable steps are taken to correct the information.

8. Security

We take reasonable measures to protect your personal information from unauthorised access, disclosure, alteration, and destruction. However, no method of transmission over the internet or electronic storage is completely secure, and we cannot guarantee absolute security.

9. Notifiable Data Breaches

Life Solutions OT is subject to the Notifiable Data Breaches scheme under Part IIIC of the Privacy Act 1988 (Cth). If a data breach occurs that is likely to result in serious harm to an individual whose personal information is involved, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as soon as practicable, and take steps to contain and address the breach.

10. Resolving Your Concerns and Complaints

Privacy concerns and complaints are taken seriously. Written expressions of concern should be directed to the contact details in clause 14, and will be addressed promptly. Alternatively,

individuals may contact the Office of the Australian Information Commissioner (OAIC) for further assistance.

11. State Health Privacy Law

Where services are provided to clients in New South Wales, the Health Records and Information Privacy Act 2002 (NSW) may also apply to the handling of your health information, in addition to the Privacy Act 1988 (Cth).

12. Automated Processing and Decision-Making

Life Solutions OT uses AI-assisted tools to help prepare drafts of clinical documentation, as described in clause 3. These tools do not make, and are not used to make, any decision about your supports, funding, eligibility, diagnosis, or care. All clinical judgment and decisions remain with your treating occupational therapist, who reviews and approves all documentation before it is finalised.

13. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, the digital tools and third parties we use, or changes in the law. The latest version will be posted on our website with the effective date.

14. Contact Us

If you have any questions or concerns about this Privacy Policy, or wish to make a request or complaint, please contact us. Thank you for choosing Life Solutions OT. Your privacy is important to us.

Email: lifesolutionsot@outlook.com

Mobile: 0406 367 454