



PURPOSE

Connected Minds TMS (the Company) respects the personal privacy of clients, employees, position applicants, suppliers, providers, and all business contacts. This policy, along with the related document, has been formulated to inform all who have dealings with the Company with a clear outline of how and why information (including personal information we have sourced from third parties) is collected, stored and used by the Company.

Our practices comply with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), and, where applicable, international standards such as the General Data Protection Regulation (GDPR) and the Health Insurance Portability and Accountability Act (HIPAA).

APPLICATION

The Company directors, managers, employees, consultants and contractors have a responsibility to always apply this policy. The Privacy Officer has a responsibility to bring issues related to the application of this policy and the business activities of the Company to the attention of management.

This policy applies to all clients, customers, suppliers, providers, contractors, visitors, officers and employees and applicants / candidates for vacant positions with the Company.

GENERAL MATTERS

Information is collected from numerous sources for business and clinical purposes and dependent on the purpose for collection, will be held or used in the business as required.

The Company regards all information that is collected and held as being private and confidential and committed to complying with the requirements in the legislation for privacy and confidentiality. The Company is bound by the Privacy Act 1988 (Cth), which sets out a number of principles concerning the privacy of individuals.

The Australian Government has set 13 Australian Privacy Principles (Schedule 1 of the *Privacy Amendment (Enhancing Privacy Protection) Act*) which are noted below and are covered in more detail within this link [Rights and responsibilities | OAIC](#):

1. Open and transparent management of personal information
2. Anonymity and pseudonymity
3. Collection of solicited personal information
4. Dealing with unsolicited personal information
5. Notification of the collection of personal information
6. Use or disclosure of personal information
7. Direct marketing
8. Cross-border disclosure of personal information
9. Adoption, use or disclosure of government related identifiers
10. Quality of personal information
11. Security of personal information
12. Access to personal information
13. Correction of personal information

INFORMATION WE COLLECT

We may collect:

- Personal Identification Information: Name, address, phone number, email address, date of birth, and other contact details.
- Health Information: Medical history, treatment plans, diagnostic information, and details related to your transcranial magnetic stimulation (TMS) sessions.
- Payment Information: Billing details and payment methods for services rendered.

- **Psychometric Data:** Information collected through mental health assessments, questionnaires, or tests conducted during your care.
- **Technical Information:** When you interact with our website or systems, such as IP addresses and browser types.
- **Audio and Video Recordings:** Security cameras with audio are installed in certain areas of our clinic for safety and security purposes.

HOW WE COLLECT INFORMATION

- **Direct Interactions:** When you fill out forms, attend consultations, or contact us via email or phone.
- **Medical Software:** We use Cliniko, a secure, cloud-based medical software system, to manage appointments, treatment notes, and health records.
- **Psychometric Assessments:** During your care, we may conduct assessments or surveys to evaluate your mental health and treatment progress.
- **Security Cameras:** Audio and video recordings captured within the clinic premises for safety and security purposes.
- **Website:** Through online forms or cookies, if applicable.

HOW WE USE YOUR INFORMATION

Your information is used to:

- Provide medical assessments and TMS treatments tailored to your needs.
- Schedule and manage appointments through Cliniko.
- Communicate with you about your care, including reminders, updates, and follow-ups.
- Process payments and manage billing.
- Enhance the security and safety of patients, staff, and visitors through the use of security cameras with audio.
- Conduct research and improve clinical outcomes: Psychometric data may be anonymized and used for research purposes. Your identity will remain confidential, and no personally identifiable information will be included in any research findings.
- Maintain legal and regulatory compliance with healthcare standards.

SHARING YOUR INFORMATION

We may share your personal information under the following circumstances:

- **Cliniko:** Your health data is stored securely in Cliniko, which is HIPAA-compliant and adheres to strict data protection standards.
- **Service Providers:** Third-party service providers involved in payment processing, IT support, or operational functions, who are bound by confidentiality agreements.
- **Research Purposes:** Anonymized psychometric data may be shared for research and analysis to improve treatment outcomes and clinical practices. Your identity will never be disclosed.
- **Security Systems:** Audio and video recordings may be shared with law enforcement or legal authorities if required for investigations or legal proceedings.
- **Legal Obligations:** When required by law or to protect your health and safety. We do not sell, rent, or share your information for marketing purposes.

SECURITY CAMERAS

We use security cameras with audio in designated areas of the clinic to:

- Ensure the safety and security of patients, staff, and visitors.
- Monitor and address any incidents on the premises.

Important Notes:

- Audio and video recordings are stored securely and accessed only by authorized personnel.
- Cameras are not installed in private areas, such as treatment rooms or restrooms.

DATA SECURITY

We implement strict security measures to protect your personal information, including:

- Secure data storage in Cliniko's encrypted system.
- Secure storage of audio and video recordings.
- Secure handling and anonymization of psychometric data used for research.
- Regular staff training on data privacy and security protocols.
- Access controls to ensure only authorized personnel can view sensitive data.

YOUR RIGHTS

You have the right to:

- Access your personal and health information.
- Request corrections to your records if inaccurate or incomplete.
- Withdraw consent for data processing (subject to legal requirements).
- Request information about audio and video recordings that involve you, within the boundaries of applicable laws.
- Request to opt out of the use of your anonymized psychometric data for research purposes.
- File a complaint with a regulatory authority if you believe your rights have been violated.

DATA RETENTION

We retain your records, including anonymized psychometric data and audio/video recordings, for the period necessary to fulfill treatment, safety, research, legal, or operational requirements. After this period, data will be securely deleted in compliance with applicable regulations.

THIRD-PARTY LINKS

Our website or communications may contain links to third-party sites. We are not responsible for the privacy practices of these websites and encourage you to review their policies.

UPDATES TO THIS POLICY

We may update this Privacy Policy to reflect changes in practices or legal requirements. Any updates will be posted on our website with the revised date.

CONTACT

If anyone has any concerns about this policy, or think the Company may have breached any aspect of this policy, please contact the Privacy Officer:

Telephone: 0411 020 053	or	By mail:	Privacy Officer
			Connected Minds TMS
			1/257 Oxley Avenue
			MARGATE QLD 4019