

Privacy and Confidentiality Policy



Mobile Therapy Tasmania

1. Open and Transparent Management of Personal Information (APP 1)

1.1 Purpose

Mobile Therapy Tasmania (MTT) is committed to managing personal information in an open and transparent manner, in compliance with the Australian Privacy Act 1988 (Cth) and all Australian Privacy Principles (APPs).

1.2 Compliance with the Australian Privacy Principles

We have implemented procedures and systems that:

- Ensure compliance with all APPs and any registered APP codes that apply to us.
- Handle inquiries and complaints about privacy concerns in a clear and accessible way.

1.3 APP Privacy Policy

Our Privacy Policy outlines how we manage personal information, including:

- Types of information collected (e.g. name, contact information, health history, billing details)
- Collection and storage methods (e.g. intake forms, emails, securely stored electronically and/or physically)
- Use and disclosure of information (only for service delivery, client support, and business operations)
- Access and corrections processes for clients
- Privacy complaints procedures
- Overseas disclosure (currently not applicable)

1.4 Availability of the Privacy Policy

- Available free of charge via our website.
- Available in alternative formats if requested, where reasonable and practicable.

2. Anonymity and Pseudonymity (APP 2)

2.1 Right to Anonymity and Pseudonymity

Clients have the right to remain anonymous or use a pseudonym when interacting with Mobile Therapy Tasmania, where practicable.

2.2 Exceptions to Anonymity

Anonymity may not be possible if:

- We are legally required to collect identity details (e.g. for NDIS or Home Care Package funding).
- Verifying identity is necessary for safety, scheduling, or emergency purposes.

3. Collection of Solicited Personal Information (APP 3)

3.1 Purpose

We collect personal information only when reasonably necessary to provide massage therapy services and related support.

3.2 Collection of Personal Information (Other than Sensitive Information)

We collect information such as:

- Full name
- Contact details
- Date of birth
- Emergency contact details
- Billing and payment information

3.3 Collection of Sensitive Information

Sensitive information (e.g., health history) is collected only if:

- The client consents; and
- It is necessary for service provision.

Examples include health conditions, medication history, or funding details (NDIS, Home Care Packages).

3.4 Exceptions to Consent

Sensitive information may be collected without consent if required by law or to prevent serious threats to health or safety.

3.5 Lawful and Fair Collection

Personal information will always be collected lawfully, fairly, and directly from individuals where practicable.

3.6 Solicited Personal Information

Personal information is collected through client intake forms, conversations, emails, online bookings, and third-party referrals (with consent).

4. Dealing with Unsolicited Personal Information (APP 4)

4.1 Purpose

We handle unsolicited personal information responsibly and assess its relevance under APP 3.

4.2 Assessment of Unsolicited Personal Information

We determine if we could have lawfully collected the information. If not, it is securely destroyed or de-identified.

4.3 Examples of Unsolicited Personal Information

- Excessive health details
- Referrals without client consent
- Employment applications with unnecessary information
- Accidental disclosures

4.4 Disposal or Retention of Unsolicited Information

If lawful to retain, it is treated as solicited personal information and protected accordingly.

5. Notification of the Collection of Personal Information (APP 5)

5.1 Purpose

Clients are informed when personal information is collected.

5.2 Information Provided at Collection

We notify clients about:

- Our identity and contact details
- Third-party collection (if applicable)
- Legal collection obligations
- Purposes of collection
- Consequences of non-provision
- Disclosures to other entities
- Access and correction rights
- Complaints handling

- Overseas disclosure (if applicable)

6. Use or Disclosure of Personal Information (APP 6)

6.1 Use and Disclosure

We use personal information only for the primary purpose it was collected unless consent is given for secondary use or an exception applies.

6.2 Secondary Purposes

Secondary use is permitted if clients would reasonably expect it or if required by law.

6.3 De-identification

Where appropriate, we de-identify information before disclosure.

6.4 Record Keeping

We keep a written note when information is disclosed for enforcement purposes.

7. Direct Marketing (APP 7)

7.1 General Approach

We do not use personal information for direct marketing without consent.

7.2 Exceptions

Direct marketing of non-sensitive information is allowed if clients would reasonably expect it and an easy opt-out option is provided.

7.3 Sensitive Information

Sensitive information is only used for direct marketing with explicit consent.

7.4 Opting Out

Clients can opt out of direct marketing at any time, free of charge.

8. Cross-Border Disclosure of Personal Information (APP 8)

We ensure overseas recipients comply with Australian privacy standards before disclosure.

9. Adoption, Use, or Disclosure of Government-Related Identifiers (APP 9)

We only adopt, use, or disclose government-related identifiers (e.g., TFN, Medicare number) where legally required.

10. Quality of Personal Information (APP 10)

We take reasonable steps to ensure information is accurate, up-to-date, and complete.

11. Security of Personal Information (APP 11)

- Information is protected against misuse, loss, unauthorised access, modification, or disclosure.
- When no longer needed, information is destroyed or de-identified.

12. Access to Personal Information

Clients have the right to access their personal information, subject to certain exceptions. We aim to provide access promptly and reasonably.

13. Correction of Personal Information

If personal information is inaccurate or outdated, we take reasonable steps to correct it.

If we refuse a correction, clients may request a statement be attached noting the disputed accuracy.