Website Privacy Policy

1. Introduction

1.1. This website, www.changesinbetween.com or www.changesinbetween.com.au is owned and operated by me, Julie Jensen, trading as Changes in Between® ABN 613 924 88709. If you have any questions or need further information, please contact:

Julie Jensen
PO BOX 2373, Ivanhoe East Victoria, 3079 Australia
julie@changesinbetween.com
0411241005

1.2. This document sets out my Privacy Policy. It describes how I collect and manage your personal information when you interact with this site. I take this responsibility very seriously. If you have any questions or concerns about how your personal or sensitive information is being handled, please do not hesitate to contact me.

1.3. I comply with the Australian Privacy Principles set out in the *Privacy Act* 1988 (Cth) (Privacy Act). I understand that visitors from the EU may access this site, so I also recognise the General Data Protection Regulations (GDPR).

2. Personal Information

2.1. If you engage with me via this website, or choose to become my client, I may ask to collect the following kinds of personal information from you, including:

a. identifying data: contact details such as your name, home address including the state and country that you live in, email address, phone numbers, emergency contact, and occupation,
b. your opinion about future topics, products or services that may interest you, and

c. information that allows me to tailor my content to your needs when you sign up for one of my webinars, workshop, seminars, presentations, or promotional events.

3. Collection and Use

3.1. I may collect your personal information by various means including:

a. website contact forms,
b. when communicating through email, on the phone or in-person,
c. when you correspond to me through social media platforms such as Facebook or LinkedIn or similar sites,
d. when you become a client,
e. an opt-in form for my mailing list,
f. automatically, through the use of cookies, and
g. through third parties, which may include referrals from other health service providers and support coordinators.

3.2. I use this information to:

a. respond to your enquiries,
b. document and review the services provided,
c. provide you with relevant news and updates about my services,
d. improve my website and the services I provide,
e. contact you about new offers and services, and
f. inform you about any upcoming webinars, presentations or other events being organised by me if appropriate.

3.3. I will only collect your personal information:

a. with your full awareness and consent, such as when you email me, contact me by phone, tick a checkbox or fill in a form to provide me with information,
b. if I need it to provide you with information or services that you request,
c. if I am legally required to collect it, and
d. for necessary administrative processes if you become my client.

4. Sensitive Information

4.1. I understand that some personal information is particularly sensitive, and that you are trusting me to keep this information confidential.

4.2. I will only collect sensitive information by methods that are reasonably secure, such as:

a. through my consent form when you book an appointment,
b. in a zoom consultation, telephone call, or face to face, and
c. when you send me information in an email. Please note that I use Google Workspace for emails which provides industry-standard security and privacy protections. However, email is not a completely secure method of communication. If you are sending particularly sensitive or confidential information, or have concerns about the security of your own email service, please ask me about alternative ways to share that information with me.

4.3. My reason for collecting this information is:

a. so that I can provide you with the services you have requested from me, and
b. to ensure that I am providing you with the most appropriate services.

4.4. The sensitive information I ask you to provide for this purpose may include:

a. your birth date,
b. your relevant mental health and medical history,
c. any current medical and psychological issues, and details of any other service providers that you are working with,
d. referral information (if applicable),
e. details associated with the services I provide to you, such as information you share in my intake and assessment process, details about our contractual relationship, intervention plans, consultation notes, reports, and (if applicable) psychometric testing results,
f. information relating to the issues of concern that you would like to work on,
g. Information about your family and other important relationships, and
h. information about your living arrangements.

4.5. I am committed to securely storing and handling your sensitive information.

Sensitive information is stored on third-party cloud-based storage that is compliant with strict world class encryption & privacy protection standards. Access is via two-factor password authorisation and only I have access. You can find out more about the security provisions of the storage platforms I use in the section on Security below.

4.6. You may choose not to provide me with your sensitive information. However, if you choose not to be completely honest with me, I may not be able to provide you with the services that you request.

5. Disclosure of Information

5.1. Reasons why I may disclose your information include:

a. to provide you with the services you have requested,
b. as a counselling and psychotherapy service, it is a requirement for registration that I engage in professional supervision where I may discuss elements of our working relationship with my supervisor, although any records disclosed are de-identified to protect your confidentiality,
c. it may be necessary to disclose client records or information to third parties where there is a direct and imminent threat to the safety or health of the client or another person (such as to protect the client from suicide or self-harm, to assist in the care or treatment of the client, or to prevent harm to another person), and
d. to send you any documents via the postal service if you are unable to receive them via email.

5.2. Unless there is a direct and imminent threat to your safety or health, or that of another person, I will seek your consent before sharing relevant information that identifies you with:

a. support coordinators and support workers,
b. my clinical supervisor (for counselling and psychotherapy), and
c. other health service providers.

5.3. I may also disclose your information if required by law to do so or in circumstances permitted by the *Privacy Act* – for example, where I have reasonable grounds to suspect that someone is engaging in unlawful activity, or misconduct of a serious nature, which relates to my functions or activities, and in response to a subpoena,

discovery request or a court order. I may also need to disclose your information should it become apparent that you are thinking of harming yourself or someone else.

5.4. If you have any concerns regarding the disclosure of your information in this context, please do not hesitate to get in touch with me to discuss this personally.

5.5. I will use all reasonable means to protect the confidentiality of your information while in my possession or control. I will not knowingly share any of your information with any third party other than the service providers who assist me in providing the information and/or services I am providing to you. To the extent that I do share your information with a service provider, I would only do so if that party has agreed to comply with my privacy standards or I am satisfied that the service provider has a suitably protective policy of their own. Some of my service providers may be overseas and may not be subject to Australian Privacy Laws. Please contact me if you have any concerns about the potential disclosure of your information.

6. Security

6.1. I will take reasonable physical, technical, and administrative safeguards to protect your personal and sensitive information from misuse, interference, loss, and unauthorised access, modification, and disclosure.

6.2. I will manage risks to your information by:

a. storing files securely,
b. ensuring that only I have access to sensitive information,
c. releasing information to service providers only with your consent, and
d. conducting regular audits of my security systems.

6.3. As mentioned above, your information may also be stored with a third-party provider, where it will be managed under their security policy. The following security policies may apply during our work together:

- Adobe Sign - https://business.adobe.com/assets/pdfs/products/sign-solutions/acrobat-sign-security-overview.pdf
- Calendly - https://calendly.com/help/calendly-platform-security-and-compliance
- Google Workspace - https://workspace.google.com/intl/en_au/security/

- Halaxy - https://www.halaxy.com/article/security
- Stripe - https://stripe.com/docs/security
- Wordpress - www.wordpress.com/support/security
- Zoom - https://zoom.us/docs/en-us/privacy-and-security.html

If you are communicating with me via electronic means such as email, Zoom, contact forms or Facebook, I may not have full control over the transmission or storage of any personal information disclosed (although I try to employ best practice cybersecurity standards at all times). You agree that by participating in such forms of communication you understand and accept that there is an inherent risk of disclosure or loss of your personal information for which I cannot be held responsible. If you are concerned about transferring particularly sensitive information, please ask me about alternative options that may be more secure.

7. Cookies and Google Analytics

7.1. Cookies are small text files that are commonly used by websites to improve a user's experience, collect statistics or marketing information, and provide access to secure areas.

7.2. You can choose to configure your browser settings not to accept cookies, but this may interfere with the functioning of this website.

7.3. My website uses Google Analytics to collect information about your use of my website so that I can get strategic information about how my website is being used and improve its functionality. You can find out more about the information Google collects and how it is used here: https://support.google.com/analytics/answer/6004245.

7.4. Google provides an add-on for your browser that you can use to opt-out and prevent your data being used by Google Analytics. You can access that add-on here: https://tools.google.com/dlpage/gaoptout.

8. Access to Information

8.1. You can contact me to access, correct or update your personal information at any time.

8.2. Unless I am subject to a confidentiality obligation or some other restriction on giving access to the information which permits me to refuse you access under the Privacy Act, and I believe there is a valid reason for doing so, I will endeavour to make your information available you within 30 days.

8.3. An administration fee may be charged if the request requires considerable time and effort.

9. Retention and disposal of records

9.1. Records are retained in case they are required for future reference, either in relation to future client services or in relation to legal or administrative matters.

9.2. Client records are retained for a minimum of 7 years after the last contact with you.

9.3. Client records will be destroyed in a secure manner that ensures nondisclosure and preserves confidentiality through secure deletion of records and secure shredding of hard copy notes. A register will be kept of the name of the client whose file was destroyed and the period of time over which the file covered as well as the date that it was deleted or destroyed.

10. Complaints

10.1. If a breach of this Privacy Policy occurs, or if you wish to a request a change to your personal information, you may contact me by sending an email outlining your concerns to me at julie@changesinbetween.com.

10.2. If you are not satisfied with my response to your complaint, you may seek a review by contacting:

a. the Office of the Australian Information Commissioner using the information available at http://www.oaic.gov.au/privacy/privacy-complaints, or
b. the Victorian Health Complaints Commissioner via https://hcc.vic.gov.au/.

11. Notification of Change

11.1. When I update my Privacy Policy, I will post a copy of the revised policy on my website.

12. Notification of Breach

12.1. If I have reason to suspect that a serious data breach has occurred and that this may result in harm or loss to you, I will immediately assess the situation and take appropriate remedial action.

12.2. If I have reasonable grounds to believe that an eligible data breach has placed you at risk, I will notify the Office of the Australian Information Commissioner and either notify you directly, or if that is not possible, publicise a notification of the breach on this website, as required by law.

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