

Website Terms of Use and Privacy Policy

Introduction

1. This Privacy Policy is the official privacy policy of Klint Pty Ltd and its subsidiaries and other related bodies corporate (“**Klint**”). It applies to all personal information collected by Klint, including via www.klintneuro.com.au and any related Klint website, social media page, internal website or intranet (each a **Website**); and from an individual via any other means, including physically or electronically (together, the **Collection Channels**).
2. In this policy we explain how and why we collect your personal information, how we use it and disclose it, and what controls you have over our use of it. We appreciate that you may have certain concerns about how your personal information is collected, used and shared. We can assure you that we will always handle your personal information securely and carefully. Among other things, we comply with all applicable Australian privacy laws including the Australian Privacy Principles.
3. In addition to the provisions of this Privacy Policy, there may also be specific and additional privacy and consent provisions that apply to certain Collection Channels. Because those specific and additional provisions also relate to your privacy protection, we recommend that you review them wherever they appear. In the event of any inconsistency between the provisions of this Privacy Policy and those other specific and additional provisions, the specific and additional provisions will prevail.

Collection of Information

4. Throughout this privacy policy we refer to “personal information”, which means information or an opinion about 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. Your first and last name, date of birth, gender, home address, contact telephone number, mobile telephone number, email address and employment details are examples of information which may constitute personal information. Personal information may also include information we may collect about your individual preferences.
5. Some information provided to us by customers, contractors and other third parties might be considered to be personal information. We will only collect such personal information if it is necessary for one of our functions or activities. The kinds of personal information that Klint collects are set out below.

Information that you provide to us

6. We collect personal information that you provide directly to us, such as when you make an enquiry or booking or if you subscribe to our newsletter. This may include:
 - a. your name;
 - b. your contact details including your email address, delivery address, phone number and social media handles;
 - c. more detailed contact preferences;
 - d. information regarding your experiences with our products and services;
 - e. personal information such as the nature of your condition; and

- f. financial information including credit card and payment details.
7. Financial information that is collected via the website is used by Klint to bill you for products and services. Any financial information that is collected is for the purpose of transaction approval and funds transfer. The financial information we collect from you is kept securely and held on secure servers in controlled facilities.

Information that we collect from your use of our Websites

8. When you use a Website, we may also collect personal information about you in the following general categories:
- a. Location information: if you permit a Website to access location services through the permission system in your mobile device, we may collect the precise location of your device.
 - b. Transaction information: we collect your transaction details when you place an order, including the products you have ordered, the date and time of your order and the amount charged.
 - c. Usage and preferences: We collect information about how you interact with our Website, including the pages you visit, your preferences and settings that you choose. We may do this through the use of cookies and other similar technologies that uniquely identify you.
 - d. Device information: We may collect information about your device such as the hardware model, operating system, preferred language, unique device identifier and mobile network.
 - e. Other information: We may also collect and log information such as your IP address, access dates and times, browser type and pages visited when you interact with a Website.

How Klint collects, uses and discloses personal information

9. At or before the time the personal information is collected by us via a particular Collection Channel, we will take reasonable steps to provide you with a collection statement to ensure that you are made aware of who we are, the fact that you are able to gain access to the information held about you, the purpose of the collection, the type(s) of organisations to which we usually disclose the information collected about you, any laws requiring the collection of the information and the main consequences for you if all or part of the information is not collected. We will not collect or monitor any personal information about you without your consent, included as provided in this privacy policy.

Active information collection

10. In particular, Klint will collect your personal information from you in the following situations:
- a. If you contact Klint, we may keep a record of that correspondence;
 - b. When you participate in any offers, promotions or marketing activities.
 - c. When you apply for and/or establish and/or access an account or order a product;
 - d. When you submit your e-mail address via a Website or provide us with personal information via any medium, including a Website;

- e. When you place an enquiry via a Website to book a physical or virtual appointment, in which case we may require you to provide us with contact information including your name, address, telephone number or email address and financial information (such as credit card details);
- f. When you interact with a Website for a specific purpose; and
- g. When you use or browse a Website generally.

Cookies and Passive Information Collection

- 11. As you navigate through our Website, certain information can be passively collected (that is, gathered without your actively providing the information) using various technologies, such as cookies, Internet tags or web beacons, and navigational data collection (log files, server logs, and clickstream data). For example, we may collect information about matters including but not limited to the date, time and duration of visits and which pages of a Website are most commonly accessed. This information is generally not linked to the identity of visitors, except where a Website is accessed via links in an email or another electronic message we have sent or where we are able to uniquely identify the device or user accessing a Website, such as when you are logged into an account.
- 12. We may combine your anonymous or personal visitor session information or other information collected through tracking technologies with other personal information collected from you from time to time via our Collection Channels, in order to understand and measure your online experiences and to determine what products, promotions and services are likely to be of interest to you. By accessing a Website via links in an email we have sent and/or by accessing a Website where you have identified yourself, you consent to the collection of such information where it is personal information.

Browser Permissions

- 13. You can set your browser to accept all cookies, to reject all cookies, or to notify you whenever a cookie is offered so that you can decide each time whether to accept it. To learn more about cookies and how to specify your preferences, please search for "cookie" in the "Help" portion of your browser.

Use of information collected and disclosure of personal information to others

- 14. Personal information collected will be used for the following primary purposes:
 - a. For the purposes stated on a particular Collection Channel;
 - b. To maintain the functionality of a Website, including the provision of information to you relating to the content available on the Website;
 - c. For assessment, diagnosis and treatment;
 - d. For communicating with you, your insurance agency or other health providers involved in your care;
 - e. For demonstrating improvements or progress in the form of assessments and outcome measures for justification of interventions to you, insurance agencies or other funding bodies;
 - f. To send you any important communication relating to our operations and service delivery as required;
 - g. To provide you information about relevant content, services and products;

- h. To provide marketing materials, events, special offers, competitions and promotions via any medium including mail, telephone, email, SMS or any other form of electronic, emerging, digital or conventional communications channel;
 - i. To maintain our relationship with you;
 - j. To respond to enquiries;
 - k. To obtain opinions, feedback and comments about our services and to conduct other market research and development;
 - l. To engage in quality improvement activities with you;
 - m. To provide, maintain and improve our products and services; and
 - n. To customise a Website based on your preferences.
15. Failure to provide personal information may result in Klint being unable to provide you with the products or services requested by you, provide you with certain content, information, event or product information (where applicable).
16. In order to operate a Website or deliver a product or service (including for example, processing of credit card payments), personal information may also be shared with our group companies, selected service providers and/or other trusted third parties. Our group companies, selected service providers and/or other trusted third parties may be engaged to perform a variety of functions, such as data storage, fulfilling orders, conducting market research, processing credit card payments, assisting with promotions and providing technical services for our Websites. These companies may have access to personal information if needed to perform such functions. However, these companies may only use such personal information for the purpose of performing that function and may not use it for any other purpose.
17. We may use or disclose personal information held about an individual for the primary purpose for which it is collected - that is, to carry on our business and provide services to our customers. We may also use such information for a purpose related to the primary purpose of collection and where you would reasonably expect that we would use the information in such a way (e.g. major delivery companies, mail houses and third-party fulfilment contractors). This information is only disclosed to persons outside our business in the circumstances set out in this policy or as otherwise notified to you at the time of collection of the information, or with your permission.
18. In addition we are permitted to use or disclose personal information held about you:
- o. Where you have consented to the use or disclosure;
 - p. Where we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety;
 - q. Where we reasonably suspect that unlawful activity has been, is being or may be engaged in and the use or disclosure is a necessary part of our investigation or in reporting the matter to the relevant authorities;
 - r. Where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process);
 - s. Where we reasonably believe that the use or disclosure is necessary for prevention, investigation, prosecution and punishment of crimes or wrongdoings or the preparation for, conduct of, proceedings before any court

or tribunal or the implementation of the orders of a court or tribunal by or on behalf of an enforcement body; and

Photography and videos

19. Klint therapists may collect photography and videos for the purposes of assessment and analysis, and may be used to assist in service delivery and quality improvement within the practice. These will be saved and stored securely on mobile devices with password protection and if relevant, saved onto our practice management software that is also password protected and securely held within Australia.
20. Photography and videos on our practice management software will be available to all current team members at Klint for the duration of their employment only.
21. We will explicitly seek your permission and consent through use of our Multimedia Consent Form for use of photography and videos relating to your assessment, treatment or analysis for any other purposes (such as marketing, teaching or for research etc). Please speak to your therapist about this Consent Form.

Children

22. Personal information will not be collected by any person who is known by Klint to be under the age of eighteen (18) without the consent of a parent or legal guardian. Persons under age eighteen (18) may only provide personal information with the involvement and consent of a parent or legal guardian.

Direct marketing

23. Klint and trusted third parties in Australia, may contact you via telephone, SMS (Short Message Service), email, post or any other form of electronic, emerging, digital or conventional communications channel using the information provided in order to contact you in respect of the primary purposes for collection of personal information as stated above.
24. Klint does not send advertising or marketing information unless we have your express or inferred consent in accordance with Australian laws. If you receive communications from us which you do not wish to receive, you may remove your name from the database either by utilising the functional unsubscribe facility (if the communication is via commercial electronic message) or by contacting us via the contact details in this Privacy Policy. Please allow 10 days for this request to be processed.

Other sites

25. Our Website may contain links to the websites of other organisations which may be of interest to you. Their inclusion cannot be taken to imply any endorsement or validation by us of the content of the third party website. Linked websites are responsible for their own privacy practices and you should check those websites for their respective privacy statements. Klint is not responsible, nor does it accept any liability, for the conduct of companies linked to our Websites.

Security and storage

26. We will take all reasonable steps to store your personal information securely under the Australian Privacy Laws under the Privacy Act 1988.
27. All team members in our practice will have access to your personal information, on a need-to-know basis with respect to their roles.

28. Personal information stored may be electronic or in hard copy. All hard copies will be destroyed following scanning into our practice management system.
29. Electronic information will be stored on our practice management system that is hosted on the cloud with servers based in Australia. This is password protected and regularly backed up.
30. All health information is stored for a minimum of 7 years from the date of last entry.
31. Our Website uses a security measure called Secure Sockets Layer (SSL) technology. SSL locks all your critical information in an encrypted envelope, making it extremely difficult for this information to be intercepted. Our SSL technology is the industry standard in Internet security.
32. No data transmission over the Internet can be guaranteed to be 100 percent secure. As a result, while we strive to protect users' personal information, Klint cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once Klint receives your transmission, it makes every reasonable effort to ensure its security on our systems.
33. Klint retains the information you provide to us including your contact and credit card details to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. This information is held by secure servers designed for this purpose.

Access to and correction of personal information

34. Klint is committed to and takes reasonable steps to maintain accurate, timely, relevant, complete and appropriate information about our customers and website users.
35. You may request access to personal information about you held by Klint. Requests for access to your personal information should be made to:

Klint – Senior Leadership Team

101 Springvale Road
Glen Waverley VIC 3150

Telephone: (03) 9555 2273
Email: info@klintneuro.com.au

36. Inaccurate information will be corrected upon receiving advice from you.
37. Klint will respond to any requests for access or correction within a reasonable time of receipt of the request.
38. Klint is not responsible for removing your personal information from the lists or databases of any third party who has previously been provided your information in accordance with this privacy policy.

Complaints

39. If you have a question or complaint about our Privacy Policy or Klint' collection, use, disclosure or safe disposal or destruction of your personal information, your feedback should be directed in the first instance to Klint Senior Leadership Team at the contact details set out in this policy. This will be handled in accordance with our Feedback and Complaints Policy.
40. We will promptly investigate your complaint and attempt to resolve the matter. If you are not satisfied with the outcome of this procedure or we have not responded to you with a determination within a reasonable period of time then you may contact the Office of the Australian Information Commissioner.

Changes to Privacy Policy

41. If Klint decides to or is required to change this Privacy Policy, it will post changes on this Klint Policy page so that users are always aware of what information is collected, how it is used and the way in which information may be disclosed.

Sale of the Company

42. If Klint merges with, or is acquired by, another company, or sells all or a portion of its assets, your personal information may be disclosed to our advisers and any prospective purchaser's adviser, and may be among the assets transferred. However, personal information will always remain subject to this privacy policy.

Acceptance

43. You accept that your use of this site includes your acceptance of this Terms of Use and Privacy Policy.