



## **PRIVACY POLICY**

Will & Way have created this Privacy Policy to demonstrate our firm and continuing commitment to maintaining the privacy of personal information provided by those receiving services through us. The following discloses our information gathering, dissemination and safeguarding practices. This policy will be continuously assessed against new technologies, business practices and our client needs.

Will & Way is subject to the National Privacy Principles under the Commonwealth Privacy Act of 1988 and relevant state legislation. This Privacy Policy applies to any personal information you provide in connection with our service.

### **Information Collection**

Will & Way gather personal and health information through a variety of methods. These include face to face interactions, interaction with our website, email, mail, phone and fax. We may collect personal and health information via these means directly from individuals, their authorised representatives, and/or third parties (e.g. doctors, therapists, family members). We only gather information that is essential or beneficial in ensuring the highest quality of service. If personal information is required for a secondary reason, like marketing or newsletters, we will provide you with the opportunity to opt out.

Our website collects non-identifying information of the sort that web browsers and servers typically make available, such as: the browser type, language preference and the date and time of each visitor request. Will & Way purpose in collecting non-identifying information is to better understand how our visitors interact with our website. By using the website, you consent to the data practices described in this statement.

### **Use of Information**

Will & Way use the information gathered for the purposes of administering our business activities, providing the products and services you have requested, processing your payment, monitoring service use and continuously improving service delivery. Will & Way may contact you to conduct research about your opinion of current services or of potential new services that may be offered. Participation in this research is completely voluntary and can be discontinued at any time.

### **Disclosure of Personal Information to Third Parties**

Your health and personal information will only be shared with third parties (e.g. doctors, therapists, case managers, suppliers of equipment, family members) where the information is required to ensure effective service provision and you have given your consent. The only circumstances when this does not apply are as follows:



1. it is subpoenaed by a court, or reasonably necessary to enforce the law or investigate suspected unlawful activity, and
2. failure to disclose the information would place you or another person at risk of harm

If you claim rebates from funding bodies, we may be required to provide summary reports to referring doctors, specialists and/or agencies regarding your progress. Health research using de-identified data may also be undertaken by this service, by funding bodies or by this services' technology providers. By being a client of this service, you consent to the practices described in this statement.

### **Access to and Correction of Information About You**

Will & Way will, on request, provide you with access to the information we hold about you, unless there is an exception which applies under the National Privacy Principles. A mutually agreeable time for supervised access to your information will be arranged and we may recover from you the costs of supplying you with access to this information. Your request must be submitted in writing to the Directors and will be addressed within 28 days.

If we refuse to provide you with access to the information we hold about you, we will provide you with reasons for the refusal and inform you of any exceptions applicable under the National Privacy Principles.

### **Keeping Your Personal Information Up To Date**

We take reasonable steps to ensure that the personal information we hold about you is accurate, complete, and up-to-date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete and/or out-of-date, please contact us and we will take reasonable steps to correct this. If necessary, we will discuss an alternative course of action with you.

### **Storage and Security of your Personal Information**

Information collected is stored securely in our clinical practice management software: Splose. Hard copies of some documents are also stored in a locked client file. In accordance with this Privacy Policy, once any health or personal information comes into our possession, we will take reasonable steps to protect that information from misuse and loss and from unauthorised access, modification or disclosure.

Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure. While we strive to protect such information, we cannot ensure or warrant the security of any information you transmit to us. Therefore, use of our service is at your own risk. Splose have their own Privacy Policy which we recommend you read if you have concerns about this practice management software (see <https://www.splose.com/resources/security>).



## **Use of Artificial Intelligence (AI)**

Will & Way may use AI technologies to support service delivery, administrative processes, and operational efficiency. These tools are employed in accordance with our commitment to privacy, transparency, and ethical standards.

AI tools may assist with tasks such as scheduling, documentation, data analysis, and communication. We do not use AI to make autonomous decisions about client care, therapy planning, or eligibility assessments. All AI-generated outputs are reviewed by qualified professionals before use.

AI systems may process personal and health information strictly for the purposes outlined above. We ensure that:

- Only de-identified or anonymised data is used where possible.
- AI tools are configured to comply with the Australian Privacy Principles (APPs) under the Privacy Act 1988.
- Sensitive data is not shared with external AI providers unless explicitly authorised and protected by contractual safeguards.

Clients and staff will be informed when AI tools are used in ways that may affect their personal information. Where applicable, explicit consent will be sought before using AI in service delivery.

We assess AI tools for security risks and ensure they meet our standards for data protection. AI systems are monitored for accuracy, bias, and compliance. Any incidents involving AI misuse or data breaches will be managed under our existing privacy and incident response protocols.

We also refer to the NDIS Commission's AI transparency statement to guide responsible use of AI in disability services.

## **Photography**

If you consent to photographs being taken for the purpose of providing the service you have requested, these digital images will be secured via password protections on the device with which they were taken. We will ensure images are de-identified if being used for purposes beyond which they were initially obtained (e.g. teaching activities). We will seek explicit consent from you to use any images in which you could be identified for additional purposes (e.g. promotional activities). You may withdraw your consent for photography at any time by writing to or speaking with the Directors of Will & Way.

## **Resolving Your Concerns**

If you wish to gain access to the information we hold about you, have a complaint about a breach of your privacy or have any query on how your personal or health information is collected or used,



please forward your request via post, email or phone to the Directors of Will & Way. Your query or complaint will be responded to as soon as possible.

### **Contact Information**

Should you need to contact Will & Way, please submit a written enquiry to:

**Email:** [info@willandway.com.au](mailto:info@willandway.com.au)

**Postal Address:** 4 Noel Road, Moolap, VIC 3224

Alternatively, you can contact the office via phone on **(03) 5242 8088**

### **Further Information**

For further information about the protection of your privacy, please visit the Australian Federal Privacy Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au)