



Embrace Space

PRIVACY & CONFIDENTIALITY POLICIES

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Embrace Space Privacy Policy

EASY-TO-READ VERSION

At Embrace Space, we are committed to providing high-quality services and ensuring:

1. Your trust is earned and maintained.
2. Your privacy and rights are protected.

This policy explains how we collect, use, and share your personal, sensitive, or health information when you visit our website (www.embracespace.com.au), use our services, or contact us by phone, email, or other methods.

Legal Compliance

We adhere to:

- The Privacy Act 1988 (Cth) and amendments
- The Australian Privacy Principles (APP)
- Relevant state legislations as outlined in Appendix A (below)

For more information on the Australian Privacy Principles, visit the OAIC website:

<https://www.oaic.gov.au/privacy/australian-privacy-principles>

Types of Information We Collect

1. Personal Information:

Information that can identify you, such as your name, address, phone number, or IP address.

2. Sensitive Information:

This may include details about your racial background, political views, religion, sexual orientation, health, or criminal record.



3. Health Information:

Any information regarding your physical, mental, or psychological health, disability status, healthcare services received, or genetic information.

How We Collect and Use Your Information

We collect information directly from you or, where appropriate, from authorized third parties (e.g., NDIS nominees). We ensure you understand:

- Why your information is collected.
- Who it may be shared with (e.g., government agencies or service providers).
- How you can access and correct your information.

We may also collect information online (e.g., your visits to our website, social media interactions) and from mobile devices.

Why We Use Your Information

We use your information for:

- The primary purpose it was collected (e.g., delivering services).
- Related secondary purposes as permitted by law or with your consent.

We only collect information necessary for our services and take steps to ensure it is accurate, complete, and up-to-date. We use security measures to protect your data from unauthorised access.

Privacy Concerns and Complaints

If you have any concerns or wish to lodge a privacy complaint, please contact us at via email:

hello@embracespace.com.au

We aim to resolve all privacy complaints promptly and fairly. You can also contact:

- The Health Complaints Commissioner (HCC) for health information issues.
- The Office of the Australian Information Commissioner (OAIC) for other privacy concerns.



Correcting Information

You can request corrections to your personal information if you believe it is inaccurate. Contact our Management Team at:

hello@embracespace.com.au

If we refuse your request, we will provide a reason and give you the option to add a statement to the record.

Data Breaches

In case of a data breach likely to cause harm, we will notify affected individuals promptly via phone, SMS, or email. If direct contact is not possible, we will inform the OAIC.

Policy Updates

We may update this policy periodically. The latest version is always available on our website.



Embrace Space Privacy Policy

FULL VERSION

At Embrace Space, we are dedicated to providing exceptional services while:

Building and maintaining your trust.

Safeguarding your privacy and fundamental rights.

This Privacy Policy outlines how we collect, use, and share your personal, sensitive, or health information when you interact with our website (www.embracespace.com.au), use our services, or communicate with us by phone, email, or other channels.

Legal Framework

Embrace Space operates under the following laws:

The Privacy Act 1988 (Cth) and its amendments.

The Australian Privacy Principles (APP).

Applicable state legislation listed in Appendix A.

To learn more about the Australian Privacy Principles (APP), visit the OAIC website.

Types of Information We Collect

Personal Information: This encompasses any data that can identify an individual, such as names, addresses, phone numbers, or IP addresses.

Sensitive Information: Includes details on race, ethnicity, political views, religion, sexual orientation, health status, criminal records, or biometric information.

Health Information: Refers to any details concerning an individual's physical, mental, or psychological health, disability, healthcare preferences, or genetic information.



Information Collection and Usage

We gather information directly from you or, when necessary, through authorized representatives (e.g., NDIS nominees). We may also collect data from third parties with your consent.

We ensure you are informed about:

The purpose of the information collection.

Who the information might be shared with (e.g., government bodies or service providers).

How to access and update your information.

We gather this information to:

Fulfill our service commitments to you.

Answer any queries or concerns you may have.

We may also collect sensitive information if:

You consent to the collection.

It is required or authorized by law.

How We Use and Share Information

We use and disclose personal, sensitive, and health information:

For the primary purpose for which it was collected.

For a secondary purpose where it directly relates to the primary purpose and is legally permissible.

Disclosure of your information may occur when:

The secondary purpose aligns closely with the primary intent, and you would reasonably expect it.

You have explicitly consented to its use or disclosure.

It is legally required, authorized, or permitted.



We employ measures to protect your information from misuse, loss, unauthorized access, or alteration, ensuring the data remains accurate, complete, and up-to-date.

Privacy Concerns and Complaints

If you have any privacy concerns or wish to file a complaint, please reach out to us via email at: hello@embracespace.com.au

We are committed to addressing privacy issues fairly and promptly. Alternatively, you may contact:

The Health Complaints Commissioner (HCC) in your state for health information issues.

The Office of the Australian Information Commissioner (OAIC) for concerns regarding personal or sensitive information.

Correcting Your Information

You may request corrections to your personal information if it is inaccurate or misleading. Please contact our Management Team at hello@embracespace.com.au. If we decide not to amend the information, we will provide an explanation and offer the option to append a statement to your record.

If changes are made, Embrace Space will notify relevant third parties, adhering to our third-party disclosure policy.

Data Breaches and Unauthorised Access

In the event of a data breach likely to cause harm, we will notify affected individuals directly via phone, SMS, or email. If we cannot reach individuals directly, we will report the breach to the OAIC.

Policy Updates

We may update this policy periodically, and the most recent version will always be accessible on our website.

If you have questions about how we collect, use, or disclose your information, please get in touch:

hello@embracespace.com.au



APPENDIX A

Health Records Acts or equivalent legislation and Privacy and Data Protection Acts or equivalent legislation for each Australian state and territory are as follows:

Victoria

Health Records Act 2001 (Vic) and Privacy and Data Protection Act 2014 (Vic)

New South Wales

Health Records and Information Privacy Act 2002 (NSW) and Privacy and Personal Information Protection Act 1998 (NSW)

Queensland

Information Privacy Act 2009 (Qld) and Hospital and Health Boards Act 2011 (Qld) and Information Privacy Act 2009 (Qld)

South Australia

Privacy Act 1988 (Cth) and Health Care Act 2008 (SA) and Freedom of Information Act 1991 (SA)

Western Australia

Privacy Act 1988 (Cth) and Freedom of Information Act 1992 (WA)

Tasmania

Personal Information Protection Act 2004 (Tas)

Australian Capital Territory (ACT)

Health Records (Privacy and Access) Act 1997 (ACT) and Information Privacy Act 2014 (ACT)

Northern Territory

Information Act 2002 (NT)



Embrace Space External Social Media Policy

At Embrace Space, we highly value the mutually respectful relationships we cultivate with our clients. We fully acknowledge and uphold our clients' right to openly share their views and freely express themselves. We believe it is important to have a space to share those thoughts.

We kindly ask that clients refrain from posting on social media about their experiences with our staff, while actively receiving services from Embrace Space. We are committed to addressing feedback fairly and professionally and ask that all feedback be directly relayed to our Management Team. Yes, positive feedback too, which can inherently make our staff feel restrained in their ability to be authentic in the presence of clients.

Turning to social media can create unnecessary tension and discomfort for all involved. Our professional services deserve reciprocal professional conduct, especially given that our staff are also members of the same close-knit community that our clients belong to. Venting frustrations via social media, or making our staff the subject of social media fodder, can damage our shared community and jeopardise resolution processes and client-staff relationships.

Despite our best efforts to provide a quality service at all times, to protect our staff and to maintain professional boundaries, there will be times where difficult decisions need to be made to protect the wellbeing of our team. We are aware that these situations can be misrepresented on social media. We must always uphold client confidentiality and therefore, there is no recourse open to us. We want to assure that none of our company decisions are ever made lightly, and they are always in the interest of preserving a respectful and positive work environment and upholding our ethics and values.

We would like to remind our clients that while posts in local or niche social media groups may seem anonymous, they are often easily identifiable and visible to both our staff and other clients, leading to misunderstandings that can damage the very community we all value.

Our team has the right to work in a respectful environment, free from public commentary. Our staff are not public figures, nor famous stars, and they value their privacy just as much as the next introverted Autistic.



If we become aware of clients engaging in such behaviour, we reserve the right to rescind our services effective immediately. Our staff are professionals who deserve the same respect and privacy that we extend to all of our clients.

Please remember that even in anonymous groups, posts can be traced back to individuals, and nothing online is truly private.

Thank you for understanding, and for helping us maintain authentic connections and mutual respect.

The Embrace Space Team.



Embrace Space Mutual Privacy and Confidentiality Agreement

This Mutual Privacy and Confidentiality Agreement ("Agreement") is entered into by and between Embrace Space ("Company") and its clients ("Client" or "Clients"). This Agreement is an integral part of the Company's Service Agreement and aligns with the NDIS Code of Conduct to protect the privacy, confidentiality, and rights of all parties, including both Clients and Company staff.

1. Confidentiality Obligations

a. Client Information:

The Company agrees to treat all information related to the Client, including personal details, health records, service usage, and any other sensitive information, with the utmost confidentiality and in accordance with the NDIS Code of Conduct and the Australian Privacy Principles (APPs) as set out in the Privacy Act 1988 (Cth). Specifically:

The Company will only collect, use, and disclose Client information when it is necessary for the delivery of services and with the Client's consent, as per APP 3 (Collection of Solicited Personal Information) and APP 6 (Use or Disclosure of Personal Information).

The Company will take reasonable steps to ensure that Client information is accurate, up-to-date, and complete in accordance with APP 10 (Quality of Personal Information).

All personal information will be stored securely to protect against misuse, loss, or unauthorized access, as required by APP 11 (Security of Personal Information).

The Company will not disclose Client information to third parties without explicit written consent, unless required by law or in circumstances where there is a serious threat to health or safety, in accordance with APP 6 and APP 8 (Cross-border Disclosure of Personal Information).

b. Staff Information:

Similarly, the Client agrees to maintain the confidentiality of information related to Company staff. This includes, but is not limited to, the personal information of staff members, professional conduct observed during service delivery, and interactions between staff and the Client. Clients agree not to disclose any details of these interactions or any personal information about staff on social media, public forums, or with third parties unless required by law or when the Company has expressly consented in writing.

c. Communication Channels:



Any feedback, concerns, or incidents involving staff or services must be communicated directly to the Company's Management Team. This ensures that the Company can respond appropriately and professionally in line with its duty of care obligations under the NDIS Code of Conduct and to its staff, aligning with workers' rights and staff wellbeing.

2. Privacy Protection

a. Client Privacy:

The Company is committed to safeguarding the Client's privacy and will only use information shared by the Client for the purpose of delivering quality services. The Company will ensure that any data collected is securely stored and accessible only to authorized personnel involved in service delivery, in compliance with the Australian Privacy Principles (APPs), particularly APP 1 (Open and Transparent Management of Personal Information) and APP 11 (Security of Personal Information).

b. Staff Privacy:

The Client acknowledges that staff have the right to privacy and protection from undue public commentary, whether online or offline. Clients agree to respect staff members' personal and professional boundaries, recognising that they, too, are members of the community who are entitled to a safe and supportive work environment.

c. Digital and Online Spaces:

Both the Client and the Company agree that posting information about service interactions, feedback, or complaints on social media or other online platforms may breach privacy and confidentiality obligations. All parties agree to refrain from discussing or sharing sensitive details in such public forums.

3. Mutual Respect and Professional Conduct

a. Professional Standards:

The Company adheres to the highest standards of professionalism, ensuring that all interactions with Clients are conducted respectfully and professionally. In return, Clients agree to engage with staff in a manner that is respectful and maintains the professional relationship required to deliver services effectively.

b. Discontinuation of Services:



The Company reserves the right to terminate services if the Client fails to uphold the terms of this Agreement, particularly where there are breaches of confidentiality or instances of disrespectful or inappropriate behavior towards staff. This measure ensures the safety and well-being of both Clients and staff in accordance with the Company's duty of care.

4. Resolution Process

- a. The Company encourages Clients to report any concerns or incidents directly to the Company's Management Team through designated communication channels. The Company is committed to investigating and addressing all issues fairly and confidentially, ensuring the Client's concerns are heard and resolved to the best of our ability.
- b. If the Client wishes to lodge a complaint, the Company will provide information on how to access the NDIS complaints system, ensuring transparency and compliance with NDIS regulations.

5. Amendments and Compliance

- a. This Agreement is subject to changes in legislation, the NDIS Code of Conduct, and Company policy. Clients will be informed of any amendments that may impact their rights or obligations.
- b. The copy of this Agreement available on the website, for both the Client and the Company to agree to uphold the principles of mutual respect, confidentiality, and privacy as outlined above, in accordance with the NDIS Code of Conduct.

A signed copy of this agreement is to be provided to the Company, for which the Client acknowledges that they have read, understood, and agreed to the terms of this Company Privacy Policy, Mutual Privacy and Confidentiality Agreement and Social Media Policy.



Website Privacy Policy

This Privacy Policy applies to all personal information collected by Embrace Space Pty Ltd via the website located at www.embracespace.com.au. This Privacy Policy applies in addition to the Terms and Conditions of our Site.

Consent

By using our Site, users agree that they consent to:
The conditions set out in this Privacy Policy; and
The collection, use, and retention of the data listed in this Privacy Policy.

What is “personal information”?

The Privacy Act 1988 (Cth) currently defines “personal information” as meaning 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.

If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “personal information” and will not be subject to this privacy policy.

What information do we collect?

The kind of personal information that we collect from you will depend on how you use the website. The personal information which we collect and hold about you may include: Name, email, contact number.

How we collect your personal information

We may collect personal information from you whenever you input such information into the website.

We also collect cookies from your computer which enable us to tell when you use the website and also to help customise your website experience. As a general rule, however, it is not possible to identify you personally from our use of cookies.

Purpose of collection

The purpose for which we collect personal information is to provide you with the best service experience possible on the website.

We customarily disclose personal information only to our service providers who assist us in operating the website. Your personal information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.



By using our website, you consent to the receipt of direct marketing material. We will only use your personal information for this purpose if we have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from us. We do not use sensitive personal information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature.

Access and correction

Australian Privacy Principle 12 permits you to obtain access to the personal information we hold about you in certain circumstances, and Australian Privacy Principle 13 allows you to correct inaccurate personal information subject to certain exceptions. If you would like to obtain such access, please contact us as set out below.

Complaint procedure

If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact us as set out below. All complaints will be considered and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

Overseas transfer

Your personal information will not be disclosed to recipients outside Australia unless you expressly request us to do so. If you request us to transfer your personal information to an overseas recipient, the overseas recipient will not be required to comply with the Australian Privacy Principles and we will not be liable for any mishandling of your information in such circumstances.

How to contact us about privacy

If you have any queries, or if you seek access to your personal information, or if you have a complaint about our privacy practices, you can contact us through: hello@embracespace.com.au.