

	<h1>POLICIES AND PROCEDURES</h1>	Policy No: HR-AU-010
		Revision No: 1
HUMAN RESOURCES	PRIVACY POLICY	Effective Date: 1 October 2025

PURPOSE

This policy sets out how Biophilia Health manages personal, sensitive, and health information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs 1–13). As a health service provider, Biophilia Health recognises its obligation to protect the confidentiality and integrity of client and employee information. All employees, practitioners, and contractors are required to handle personal and health information lawfully, respectfully, and transparently.

COMMENCEMENT OF POLICY

This Policy will commence from 1 October 2025. It replaces all other relevant previous Policies (whether written or not).

PERSONAL AND SENSITIVE INFORMATION

These terms are defined in the Privacy Amendment (Private Sector) Act 2000 ("Privacy Act"). "**Personal Information**" is defined broadly to mean any information or opinions about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. Personal information includes a person's name, address, phone number, email address and other information or opinion that identifies or may identify that person.

"**Sensitive Information**" means information or an opinion about an individual's:

- a. racial or ethnic origin
- b. political opinions
- c. membership of a political association
- d. religious beliefs or affiliations
- e. philosophical beliefs
- f. membership of a trade union
- g. sexual preferences or practices
- h. criminal record;
- i. criminal record;
- j. that is also personal information; or
- k. health information about an individual.

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“**Health Information**” refers to information about an individual’s physical or mental health, disability, medical history, or the provision of health services.

AUSTRALIAN PRIVACY PRINCIPLES (APP)

Biophilia Health complies with the **Australian Privacy Principles (APPs)**. These 13 principles guide how we collect, use, store, and disclose personal and sensitive information.

In summary:

APP 1 - Open and Transparent Management of Personal Information

Maintain and publish a clear Privacy Policy outlining how personal information is managed.

APP 2 – Anonymity and Pseudonymity

Allow individuals to remain anonymous or use a pseudonym where lawful and practicable.

APP 3 - Collection of Solicited Personal Information

Collect only information necessary for providing health services, with informed consent.

APP 4 - Dealing with Unsolicited Personal Information

Destroy or de-identify unsolicited personal information if not required.

APP 5 - Notification of the Collection of Personal Information

Inform clients why information is collected, how it will be used, and who may receive it.

APP 6 - Use or Disclosure of Personal Information

Use or disclose information only for its collected purpose, unless consent or legal authority exists.

APP 7 - Direct Marketing

Only use personal information for marketing where consent has been given and an opt-out is available.

APP 8 - Cross-Border Disclosure of Personal Information

Ensure overseas data storage or transfer complies with APP standards.

APP 9 - Adoption, Use, or Disclosure of Government Identifiers

Do not use government-issued identifiers (e.g., Medicare, TFN) as internal identifiers.

APP 10 - Quality of Personal Information

Take reasonable steps to ensure information is accurate, complete, and up to date.

APP 11 - Security of Personal Information

Protect information from misuse, loss, and unauthorised access or disclosure.

APP 12 - Access to Personal Information

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Provide individuals access to their information upon request within a reasonable timeframe.

APP 13 - Correction of Personal Information

Correct inaccurate or outdated information promptly when notified.

POLICY APPLICATION

This section explains how Biophilia Health applies the Australian Privacy Principles (APPs 1–13) under the Privacy Act 1988 (Cth) to the management of personal, sensitive, and health information. It sets out the operational requirements that all Biophilia Health employees, practitioners, and contractors must follow.

1. Privacy Officer

A Privacy Officer is appointed by Biophilia Health to oversee privacy compliance, manage complaints, and ensure staff understand their responsibilities under this policy and the Privacy Act 1988 (Cth).

2. Open and Transparent Management of Personal Information

Biophilia Health manages personal and health information in an open and transparent way. This Privacy Policy is made available to all clients, staff, and third parties on request or through the Biophilia Health website.

- The Privacy Officer ensures this policy remains current and compliant with legislation.
- All staff must be familiar with the policy and apply it when handling personal or health information.
- Any updates to this policy will be recorded, dated, and approved by management before being released.

3. Anonymity and Pseudonymity

Where lawful and practicable, clients may choose not to identify themselves when dealing with Biophilia Health. However, identification may be required in circumstances such as:

- Providing naturopathic or clinical services;
- Issuing receipts, prescriptions, or treatment records; or
- Meeting legal, insurance, or reporting requirements.

All Biophilia Health forms should indicate where anonymity is available and where identification is required.

4. Collection of Solicited Personal and Health Information

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Biophilia Health only collects information that is reasonably necessary for:

- Providing health services;
- Maintaining accurate clinical records;
- Managing appointments, billing, and communication; and
- Meeting legal and professional obligations.

Information collected may include:

- Personal details (name, address, date of birth, contact details);
- Health information (medical history, allergies, medications, test results, treatment plans);
- Payment information; and
- Emergency contact details.

Collection must be fair, lawful, and transparent. Health information will only be collected:

- When necessary to provide a health service;
- Directly from the client unless impracticable (e.g., referral from another practitioner); and
- With informed consent.

5. Dealing with Unsolicited Personal Information

If Biophilia Health receives unsolicited information (e.g., test results not requested, or information provided in error), the Privacy Officer must determine whether it could have been lawfully collected. If not required, it will be securely destroyed or de-identified as soon as practicable.

6. Notification of the Collection of Personal Information

At or before the time of collection, clients are informed about:

- Why their information is being collected;
- How it will be used;
- Who it may be disclosed to;
- How they can access or correct their records; and
- How to lodge a privacy complaint.

This notice is included in client intake forms, electronic forms, or provided verbally during consultation.

7. Use or Disclosure of Personal Information

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Biophilia Health uses and discloses information only for the purpose for which it was collected, unless:

- The individual provides explicit consent;
- Required by law; or
- Necessary to prevent or lessen a serious threat to life, health, or safety.

Third-Party Disclosures:

Relevant health information may be shared with a client's other healthcare providers (e.g., GPs, laboratories, or allied health professionals) only with explicit consent. Any staff member uncertain about a disclosure must seek approval from the Privacy Officer and document the decision.

8. Direct Marketing

Biophilia Health will not use personal or health information for direct marketing without consent. Clients may opt in to receive newsletters or wellness updates, and can opt out at any time. Once a client opts out, their preference will be recorded in the client database, and no further marketing materials will be sent.

9. Cross-Border Disclosure of Personal Information

Biophilia Health currently uses cloud-based systems that store all client data on servers located within Australia. At present, no systems used by Biophilia Health transfer or store data overseas.

If, in future, any cloud-based system using overseas servers is adopted, Biophilia Health will ensure that all service providers comply with the Australian Privacy Principles and maintain equivalent levels of data protection. Staff must not transfer personal or health information outside Australia without the written authorisation of the Privacy Officer.

10. Adoption, Use or Disclosure of Government Identifiers

Biophilia Health will not adopt or use government-issued identifiers (such as Medicare, Centrelink, or Tax File Numbers) as its own internal identifiers. These may only be recorded where required by law or to provide a health service (e.g., for insurance or Medicare claims).

11. Quality of Personal Information

Biophilia Health takes reasonable steps to ensure all personal and health information collected, used, or disclosed is accurate, complete, and up to date. Clients are encouraged to inform practitioners of any changes to their personal or medical

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details. When information is collected from another source, Biophilia Health verifies its accuracy before using it.

12. Security of Personal Information

Biophilia Health safeguards all information from misuse, loss, unauthorized access, modification, or disclosure.

Security measures include:

- Locked cabinets for physical records;
- Password-protected and encrypted electronic systems;
- Role-based access restrictions for authorised staff only;
- Secure shredding or digital deletion of records when no longer required.

Retention:

Health records are kept for at least seven (7) years from the last client interaction, or until age 25 for minors, in line with state health record legislation.

Data Breaches:

Biophilia Health complies with the Notifiable Data Breaches (NDB) Scheme.

In the event of a breach likely to cause serious harm:

1. The breach will be immediately investigated and contained;
2. Affected individuals will be notified; and
3. The breach will be reported to the Office of the Australian Information Commissioner (OAIC).

13. Access to Personal Information

Clients have the right to access their personal or health information. Requests must be made in writing to the Privacy Officer. Access will be provided within a reasonable timeframe (usually within 14–30 days). A nominal administrative fee may apply to cover retrieval and copying. If access is refused, Biophilia Health will provide written reasons and information on how to appeal the decision.

14. Correction of Personal Information

If a client believes information held by Biophilia Health is inaccurate, incomplete, or outdated, they may request a correction. Requests must be made in writing to the Privacy Officer. Corrections will be made promptly, and written confirmation will be provided once complete. If Biophilia Health does not agree to the correction, the client may request a statement be attached to the record noting their concern.

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APPLICATION OF THE PRIVACY ACT TO INFORMATION COLLECTED

Biophilia Health applies the Australian Privacy Principles (APPs) to all personal and health information it holds, regardless of when it was collected.

This means:

- All existing records must be accurate and secure;
- Individuals have the right to access and correct information currently in use; and
- Older records must be destroyed or de-identified once no longer required.

STAFF RESPONSIBILITIES AND CONFIDENTIALITY

All Biophilia Health employees, practitioners, and administrative staff must:

- Sign confidentiality agreements before commencing work;
- Complete privacy and data protection training; and
- Follow this policy and the Privacy Act 1988 (Cth) at all times.

Any breach of confidentiality or unauthorised disclosure is considered serious misconduct and may result in disciplinary action or termination.

COMPLAINTS AND CONTACT INFORMATION

If you believe your privacy has been breached, please contact:

Privacy Officer – Biophilia Health

info@biophiliahealth.com

+61489 015 747

If you are not satisfied with our response, you may contact:

Office of the Australian Information Commissioner (OAIC)

1300 363 992 or visit www.oaic.gov.au

REVIEW

This policy will be reviewed annually, or sooner if required by changes in law or practice, to ensure compliance and effectiveness.

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QUESTIONS

Any staff member unsure about a privacy matter should seek advice from a trusted leader of Biophilia Health.

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