

PHYSIO LANE STUDIOS

Privacy Policy

Effective date: 01/04/2026 | Version 1.0 | Next review: 01/04/2028
Physio Lane Studios ABN 642 6476 7949 | 23 Cascade Street, Lawson, NSW2783

1. About this policy

Physio Lane Studios (the "**practice**", "**we**", "**us**" or "**our**") is a private musculoskeletal (MSK) physiotherapy clinic located in New South Wales. We are committed to protecting the privacy of the personal and health information of our patients, and to being open and transparent about how we collect, use, store, disclose and dispose of that information.

This policy explains how we handle personal information (including sensitive health information) in accordance with:

- **the Privacy Act 1988 (Cth)** and the 13 Australian Privacy Principles (APPs) — these apply to us regardless of our turnover, because we are a private sector health service provider that holds health information;
- **the Health Records and Information Privacy Act 2002 (NSW)** (HRIP Act) and the 15 Health Privacy Principles (HPPs), which govern health information held by private health service providers in NSW;
- **the Health Practitioner Regulation National Law (NSW)**, under which we are registered with the **Physiotherapy Board of Australia** through the **Australian Health Practitioner Regulation Agency (AHPRA)**, and the Board's Code of conduct (record-keeping and confidentiality obligations);
- **the Australian Physiotherapy Association (APA)** Code of Conduct and professional practice standards for members;
- the Notifiable Data Breaches (NDB) scheme under the Privacy Act; and
- other applicable NSW and Commonwealth legislation, including in relation to Medicare, WorkCover/icare NSW, CTP and private health insurance claims, where relevant.

By providing us with your personal information, or continuing to engage our services after being given a copy of, or access to, this policy, you consent to the collection, use and disclosure of your information as described below, unless you tell us otherwise.

2. What personal information we collect

The type of information we collect depends on the services you receive. It may include:

Category	Examples
Identity & contact details	Name, date of birth, address, phone number, email, emergency contact, Medicare/DVA/health fund details
Health information	Presenting complaint, medical and injury history, medications, imaging and specialist reports, assessment findings, treatment notes, clinical photos/video (with consent), outcome measures
Consultation records	Clinical notes made during your session, including notes drafted with the assistance of AI transcription/scribe software (see section 5)
Referral & claim information	Referrals from your GP or specialist, WorkCover/icare, CTP insurer, DVA or private health fund claim and case details
Appointment & administrative data	Booking history, attendance/cancellation record, communications with our reception team
Billing & payment details	Invoices, payment method details (processed by our payment provider — we do not store full card numbers), Medicare/health fund rebate information
Website & communications	Enquiries submitted online or by email, appointment reminder responses

3. How we collect your information

3.1 Directly from you

- New patient intake and health history forms (paper or via our online/Cliniko intake forms)
- In person, during consultations and case history discussions
- By phone, email, SMS or our online booking system
- Through our website contact or enquiry forms

3.2 From other people or organisations (with your consent, or as permitted by law)

- Your referring GP or specialist, or other members of your treating team
- Diagnostic imaging or pathology providers
- Medicare, the Department of Veterans' Affairs, your private health fund, or WorkCover/icare NSW/CTP insurer, where you are claiming through one of these schemes
- A parent, guardian or authorised representative, where you are a minor or are unable to provide information yourself

We do not collect health information about you from a third party without your consent, unless the collection is required or authorised by law, or is necessary to lessen or prevent a serious threat to someone's life, health or safety.

4. Why we collect, use and disclose your information

We collect and use your information for the primary purpose of assessing, treating and managing your physiotherapy care. This includes:

- Taking a history, conducting assessments and providing treatment
- Clinical record-keeping, as required by the Physiotherapy Board of Australia's Code of conduct
- Communicating with you about appointments, treatment plans and your account
- Billing, processing Medicare/health fund/WorkCover claims and debt recovery where necessary

We may also use or disclose your information for related secondary purposes that you would reasonably expect, such as:

- Liaising with your referring practitioner or other treating health professionals about your care
- Internal practice management, quality assurance, clinical audit and staff training (de-identified where practicable)
- Complying with our legal, regulatory and insurance obligations, including responding to AHPRA notifications or HCCC complaints
- Sending appointment reminders, recall notices and, only with your consent, practice newsletters or health information (you may opt out of non-clinical communications at any time)

We will not use or disclose your health information for direct marketing by a third party, and we will not sell your information, under any circumstances.

5. Use of AI-assisted clinical documentation

We may use AI-powered clinical scribe software to assist with transcribing and drafting consultation notes during your appointment. This helps our clinicians spend less time typing and more time focused on you.

When AI-assisted note-taking is used:

- We will tell you before your session begins and obtain your verbal consent each time it is used.
- You can decline or ask that it be switched off at any point, without affecting your care.
- Audio is processed to generate a clinical note; we only use AI scribe providers who do not retain session audio recordings, and who do not sell or share clinical data with third parties.

- We only use AI scribe providers that store and process Australian customer data within Australia and represent that they comply with the Privacy Act and Australian Privacy Principles, and that hold recognised independent security certifications (e.g. ISO 27001, SOC 2 Type II).
- The resulting note is reviewed and finalised by your treating physiotherapist and stored as part of your clinical record in Cliniko, not left within the AI tool.

Our AI scribe provider is a third-party processor, so its own privacy policy governs how it technically handles data on our behalf; we assess this against our APP and HRIP Act obligations before enabling any such tool, and before switching providers. A current link to our AI scribe provider's privacy policy is available on request.

6. Our practice management system (Cliniko)

We use Cliniko, a cloud-based practice management platform, to store bookings, clinical notes, invoices and correspondence. Cliniko:

- Hosts Australian customer data on servers located in Australia;
- Provides encryption of data in transit and at rest, role-based access control, and audit logging;
- Engages a limited number of subprocessors (e.g. for hosting, backup and payment processing) under contractual obligations consistent with the APPs; and
- Allows us to record your consent to this policy and to manage access, correction and retention of your records.

We are responsible for how your information is used within our Cliniko account, including who on our team can access it and for what purpose.

7. Email, SMS and other electronic communication

We may use email and SMS (through Cliniko or directly) to send appointment reminders, invoices, exercise programs, reports or general correspondence. Standard email is not encrypted end-to-end, so there is a small inherent risk in transmitting information this way.

- We will ask for your consent to communicate with you by email/SMS, and confirm your preferred contact details, at your first appointment.
- You may ask us to use an alternative method of communication, or withdraw consent to a particular channel, at any time.
- Please avoid sending highly sensitive information (e.g. detailed mental health history) by email unless necessary — call the clinic if you would prefer to discuss something by phone.

8. Who we disclose your information to

We only disclose your personal and health information for the purposes described in this policy, or with your consent. This may include:

- Your referring GP, specialists or other treating allied health/medical practitioners involved in your care
- Medicare, DVA, your private health fund, or WorkCover/icare NSW/CTP insurer, for claims and case management purposes
- Our software and service providers (e.g. Cliniko, our AI clinical scribe provider, our payment processor, IT support, email/SMS provider), who are contractually restricted to using your information only to provide services to us
- Our accountant, indemnity insurer or legal advisers, where reasonably necessary
- Regulators or authorities where required by law — for example AHPRA, the NSW Health Care Complaints Commission, or in response to a subpoena or court order
- A third party, without your consent, only where necessary to lessen or prevent a serious threat to the life, health or safety of any person, or as otherwise permitted under APP 6 or HPP 11

We do not disclose your information to anyone overseas as a matter of course. Where a service provider we use (such as our AI clinical scribe provider) may, in limited circumstances, process data using infrastructure outside Australia, we take reasonable steps to ensure equivalent privacy protections are in place, consistent with APP 8.

9. Data quality and security

We take reasonable steps to keep your personal information accurate, complete and up to date, and to protect it from misuse, interference, loss, and unauthorised access, modification or disclosure. These steps include:

- Storing electronic records in Cliniko behind password-protected, role-based staff access
- Using secure, encrypted connections for our software and email systems
- Restricting physical access to any paper records or devices at the clinic
- Requiring staff and contractors to comply with confidentiality obligations as a condition of engagement
- Reviewing our privacy and security practices periodically

10. Access to and correction of your information

You have a right to request access to the personal and health information we hold about you, and to ask us to correct it if it is inaccurate, out of date or incomplete. To make a request:

- Contact our Privacy Officer (details in section 14) in writing, describing the information you would like to access or correct;
- We will respond within a reasonable period — under the HRIP Act, we aim to respond within 45 calendar days;
- We may need to verify your identity before releasing information;
- In limited circumstances (for example, if access would pose a serious risk to your health or safety, or unreasonably impact another person's privacy) we may need to refuse or limit access, and we will explain our reasons if this occurs.

There is generally no charge to request access, though we may charge a reasonable fee to cover the cost of retrieving and copying extensive records.

11. How long we keep your information

As a private health service provider in NSW, we are required by the **Health Records and Information Privacy Act 2002 (NSW)** to retain health records for a minimum of:

- 7 years from the date of your last consultation with us, if you were an adult when the information was collected; or
- until you turn 25 years of age, if you were under 18 when the information was collected.

After this minimum period, we securely destroy or de-identify records that we are no longer required to keep, in a way that protects your confidentiality.

12. Data breach notification

If we experience a data breach involving your personal information that is likely to result in serious harm, we will notify you and the Office of the Australian Information Commissioner (OAIC) in accordance with the Notifiable Data Breaches scheme under the Privacy Act, and take steps to contain and remediate the breach.

13. How to make a complaint

If you have a concern about how we have handled your personal or health information, please contact our Privacy Officer in the first instance — we take all complaints seriously and will investigate and respond promptly, generally within 30 days.

If you are not satisfied with our response, you can escalate your complaint to:

Body	What they handle	Contact
Information and Privacy Commission NSW (IPC)	Complaints about health information handling under the HRIP Act	1800 472 679 · ipcinfo@ipc.nsw.gov.au
NSW Health Care Complaints Commission (HCCC)	Complaints about the clinical care or conduct of a health service provider in NSW	1800 043 159 · hccc.nsw.gov.au
Office of the Australian Information Commissioner (OAIC)	Complaints under the Privacy Act / Australian Privacy Principles	1300 363 992 · oaic.gov.au
AHPRA / Physiotherapy Board of Australia	Concerns about a registered physiotherapist's professional conduct	1300 419 495 · ahpra.gov.au

14. Contact us / Privacy Officer

For any questions about this policy, or to make an access, correction or complaint request, please contact:

- Georgia King
- Physio Lane Studios
- 23 Cascade Street, Lawson, NSW 2783
- (02) 4501 8064 · admin@physiolanestudios.com.au

15. Changes to this policy

We may update this policy from time to time to reflect changes in our practices, software or the law. The current version will always be available [on our website / at reception], and significant changes will be brought to your attention.