



PRIVACY POLICY COMMUNICATE WITHOUT BORDERS

1st January 2020

1. PART 1 – ABOUT THIS POLICY

1.1 Why does CWB have a privacy policy?

Communicate without Borders (CWB) is committed to protecting the privacy of personal information we collect and hold about individuals.

CWB is guided by the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth), other privacy laws that govern how private sector allied health service providers handle your personal information (including your health information), EU General Data Protection Regulation (GDPR) and Speech Pathology Australia's Code of Ethics (2010).

This Privacy Policy explains how CWB manages the personal information we collect, use and disclose.

CWB is a private practice for speech, language, literacy and communication under the ownership of Abby Gilbert Aubin.

2. PART 2 – HOW CWB HANDLES YOUR PERSONAL INFORMATION

2.1 What are CWB's legal obligations?

In order to provide you with the services that you have requested, CWB will need to collect and use your personal information. If you provide incomplete or inaccurate information to us or withhold personal information from us we may not be able to provide you with the services you are seeking.

2.2 What information does CWB collect?

We will only collect the information we need for the particular function or activity we are carrying out that we will discuss with you in advance.

We collect information from you that is necessary to provide you with speech pathology services and to manage our relationship with you. To provide evidence-based speech pathology services to our clients, we need to know personal information about them and others, including

- names, ages, genders, date of birth, address and other identifying information;
- developmental, medical, ethnic, language, cultural and social histories (including medications, diagnoses, surgeries, and allergies);
- disabilities and impairments;
- family histories, to the extent they may be relevant to our assessment, diagnosis and/or treatment of clients;
- work and education histories;
- hobbies, motivations, interests, and activities in which clients and their families participate; and
- We require this information to assist us to assess and treat your child.



2.3 How does CWB collect your information?

We will usually collect your information directly from you through interviews or intake forms. We collect personal information by telephone, via our online sites, through our intake form, by written documents, reports and other documents, through emails, sms and other electronic communication, and in interviews and other interactions (including face-to-face interviews, phone and online interviews).

Sometimes, we may need to collect information about your child from a third party (such as a teacher or health service provider), we will always obtain your consent prior to doing this.

2.3a Use of Jotform to collect information.

Jotform is used to collect personal information through intake forms and consent through assessment and treatment consent forms. These forms are encrypted and CWB is the owner of the key for this encryption. Data collected in Europe through Jotform is stored in European servers. You are able to choose whether to provide this information through Jotform or through another modality.

Information regarding Jotform privacy and GDPR can be found here:

<https://www.jotform.com/gdpr-compliance/>

<https://www.jotform.com/privacy/>

2.4 How does CWB use your information?

CWB uses your personal information for the purpose you have given the information to us. We will use your information to provide speech pathology services to you, to manage our relationship with you and to contact you in relation to matters concerning your/your child's care.

2.5 Who might we disclose your information to?

We may disclose your information to the following people:

(a) Other or education professionals involved in your child's treatment. Your personal information will generally only be used by the speech pathologist involved in your care, however on occasion your care may be provided by a number of professionals (for example., speech pathologist, occupational therapist and/or psychologist, teacher) working or consulting together. We may disclose your information to these professionals as part of the process of providing care and to other professionals involved in your/your child's care.

(b) Other uses and disclosures

In order to provide the best possible environment in which to treat your child, we may also use or disclose your personal information where necessary for:

- providing assessment and intervention
- activities such as quality assurance processes, patient satisfaction surveys and education and training;
- invoicing, billing and account management; our bookkeeper will have the minimum information required for the upkeep of company finances and accounts relating to session durations, your name and address.
- where required provide information to your insurance to verify treatment provided to you;
- the purpose of sending you standard reminders, for example for appointments and follow-up care, by text message or email to the number or address which you have provided to us.



2.6 How long does CWB store your information?

- The client file with information regarding assessment and treatment will be stored for fifteen years after discharge from therapy at CWB, unless good care provision would entail a longer retention period.
- For files containing information regarding the treatment of minors, this fifteen year period starts when the client reaches the age of 18.
- In cases other than those mentioned in this article, data are only stored for as long as is necessary to achieve the aim for which it was obtained.
- An exception to the above applies when data are destroyed following the client's explicit written request.

2.7 How can you access or modify your information?

- You have a right to access the information that we hold about you/your child. You can also request an amendment to your/your child's personal information should you believe that it is inaccurate.
- If we do not agree to change your record/personal information in accordance with your request, we will permit you to make a statement of the requested changes and we will enclose this with your record.
- Should you wish to obtain access to or request changes to your record you can ask us about CWB's access and correction procedure.
- Please note that CWB may recover reasonable costs associated with supplying this information to you.

2.8 Data Quality

CWB will take reasonable steps to ensure that your personal information which we may collect, use or disclose is accurate, complete and up-to-date.

2.9 How will your data be secured and stored?

CWB will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. We use technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect your privacy.

CWB will destroy or permanently de-identify any of your information which is in its possession or control and which is no longer needed for the purpose for which it was collected provided as long as CWB is not required by law or otherwise to retain the information.

Your data may be stored in the following ways:

- We use the cloud-based practice management software Cliniko. Data stored in Cliniko is encrypted and protected by the following accreditations and certifications; PCI DSS Level 1 (Payment Card Industry Data Security Standard), ISO 27001 (Information Security Management System), FIPS 140-2 (United States Federal Information Processing Standard). Data is stored in Australia or the USA, and Cliniko fulfil new EU GDPR security requirements. More information about their security and confidentiality can be found here:
- <https://www.cliniko.com/security>
- <https://www.cliniko.com/policies/privacy>.



- Dropbox is also used to store and share data relating to your/your child's personal and education, information relating to dropbox security can be found here:
- <https://www.dropbox.com/security#files>
- Dropbox files are stored in the USA.
- Email is a less secure option for sharing and storing personal information relating to health or education. We therefore aim to use email for scheduling and to share general information with you. We prefer to send information about your/your child's health and/or education digitally using Dropbox. If you choose to use email, CWB is not liable for any breach of security. We will however store your email securely, and delete it from the email server.
- At your request or consent we will share reports, treatment notes and other confidential information by email.
- On computers or laptops, these will be password protected and stored in a locked cabinet when not in use.
- On a secure external hard drive that will be stored in a locked cabinet.
- Paper data will be stored in a locked, password protected cabinet. When moving between sites/home visits, minimal paper documents will be transported and these will be securely stored as soon as possible.

2.10 What to do if you have a complaint about privacy issues

If:

- (a) you have questions or comments about this Privacy Policy;
- (b) CWB does not agree to provide you with access to your personal information; or
- (c) you have or a complaint about our information handling practices,
 - You can lodge a complaint with or contact us on the details below. We will promptly review your complaint and provide a response to you.

2.11 How to contact us if you have a complaint about privacy issues

- By letter: Communicate without Borders, Snelliusstraat 67, 2517RH, Den Haag
- By email: contact@cwbounders.com
- By telephone: +31 (0)6 3942 7543

PART 3 – HOW CWB HANDLES YOUR PERSONAL INFORMATION WHEN YOU VISIT OUR WEBSITE

This section of our Privacy Policy explains how we handle your personal information which is collected from our website: www.cwbounders.com or social media sites.

This Privacy Policy applies to your use of our website and the use of any of the facilities on our website.

3.1 How is your personal information collected on our website?

When you use our website, we do not attempt to identify you as an individual user and we will not collect personal information about you unless you specifically provide this to us.

Sometimes, we may collect your personal information if you choose to provide this to us via an online form or by email, for example, if you:

- submit a general enquiry via our contacts page;
- send a written complaint or enquiry,



- You can request this information to be deleted by emailing contact@cwboundaries.com

When you use our website, our Internet Service Provider (ISP) may record and log for statistical purposes the following information about your visit:

- your top level name (for example, .com.,gov., .org, .au etc.);
- the date and time of your visit;
- the pages and documents you access during your visit; and
- the browser you are using.

Our web-site management agent may use statistical data collected by our ISP to evaluate the effectiveness of our web-site.

3.2 Cookies

A "cookie" is a device that allows our server to identify and interact more effectively with your computer. Cookies do not identify individual users, but they do identify your ISP and your browser type.

Please find the types of cookies used on our website at this link:

<https://support.wix.com/en/article/cookies-and-your-wix-site#types-of-cookies>

Personal information such as your email address is not collected unless you provide it to us. We do not disclose domain names or aggregate information to third parties other than agents who assist us with this website and who are under obligations of confidentiality. You can configure your browser to accept or reject all cookies and to notify you when a cookie is used. We suggest that you refer to your browser instructions or help screens to learn more about these functions. However, please note that if you configure your browser so as not to receive any cookies, a certain level of functionality of the CWB website and other websites may be lost.

The following links explain how to access cookie settings in various browsers:

- [Cookie settings in Firefox](#)
- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Google Chrome](#)
- [Cookie settings in Safari \(OS X\)](#)
- [Cookie settings in Safari \(iOS\)](#)
- [Cookie settings in Android](#)

To opt out of being tracked by Google Analytics across all websites, visit this link: <http://tools.google.com/dlpage/gaoptout>.

3.3 Links to third party websites

We may create links to third party websites. We are not responsible for the content or privacy practices employed by websites that are linked from our website.

3.4 Use and disclosure

We will use any personal information collected via our website in accordance with our privacy policy.



PART 4 - PERSONAL DATA COLLECTION AND STORAGE DURING TELEPRACTICE SESSIONS

4.1 Platform

Telepractice sessions are conducted using the platform Zoom. This can be web based or downloaded application. CWB recommends downloading the app/software as this increases the functionality.

4.2 Zoom Privacy Policy

Zoom's privacy policy can be found at the following address. Here you will find information regarding their data collection and storage procedures:

- <https://zoom.us/privacy>
- CWB recommends that you read through these policies to be aware of Zoom's data management prior to agreeing to telepractice sessions.
- Zoom meetings conducted with CWB use encrypted audio and video.

4.3 Zoom Meeting Recordings

- CWB may record assessment and treatment sessions for accurate data collection and quality improvement purposes, you can opt out of sessions being recorded on the assessment and treatment consent forms or at any time during your/your child's agreement with us in writing to contact@cwboundaries.com.
- As per our policy, these recordings will only be used for their intended purpose and then deleted.