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ABN 41 536 509 168

Lilley Place Privacy Policy

December 2025

1. Lilley Place's commitment to privacy:

- 1.1. Lilley Place ("us", "we" or "our") is committed to safeguarding the privacy of our clients, staff and visitors of Lilley Place, as well as those who visit our website.
- 1.2. Lilley Place is bound by the Privacy Act 1988 (Cth) (Privacy Act), the Australian Privacy Principles, and other laws governing how health service providers handle your Personal Information and Sensitive Information (including information about your health).
- 1.3. This Privacy Policy (Policy) sets out how we collect and treat your Personal Information and Sensitive Information. The Policy applies to our website www.lilleyplace.com.au, which is operated by us, and to the products and services provided by us.

2. Definitions

In this Policy:

- 2.1. "Personal Information" is categorised as information held by Lilley Place, that may identify you, or by which your identity might be reasonably determined. The information you provide us may include, amongst other things, your name, address, email address and phone number. It does not include "Sensitive Information".
- 2.2. "Sensitive Information" means any information about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliation, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preference or practices, criminal record or health information.

3. Collection of Your Data

- 3.1. To provide our services to you, Lilley Place may receive and store Personal Information and Sensitive Information (together, 'your Data') that you enter onto our website, provide to us directly or in other formats, including our website enquiry form, intake forms, consent forms and others.

- 3.2. Your Data may include your:
 - 3.2.1. Contact details including name, phone number, address and email address;
 - 3.2.2. Payment and billing information, which we may use to bill you for our services and to process your payments (including credit card details);
 - 3.2.3. Health information (both physical and mental health) including information relating to injuries past or present, or whether you are pregnant;
 - 3.2.4. Personal history and family history; and
 - 3.2.5. Other information voluntarily provided by you.

Your Data is collected to ensure your safety and wellbeing, and that of other participants and facilitators at Lilley Place, to send information, provide updates and process purchases of services and products provided by Lilley Place.

- 3.3. Sensitive Information, which includes the definition of your Data relating to your health, will not be collected unless you consent to the collection of that information.
- 3.4. Lilley Place collects your Data from you in a variety of ways, including in person and over the phone through Client Services, via our website and online social media platforms, through administration of psychometric assessments, through our occasional voluntary anonymous Client Feedback Surveys and during service provision.
- 3.5. We may collect additional personal Data at other times, including but not limited to, when you provide self-initiated feedback, when you provide information about your personal or business affairs, change your contact or email preferences, respond to surveys and/or promotions, provide financial or credit card information, or communicate with us in any other way.
- 3.6. We may receive your Data from third parties. Those third parties may include your medical practitioners, hospitals, clinics, lawyers and/or family members. If we do, we will protect and use this information as set out in this Policy.

4. **Use of Your Data**

- 4.1. Personal Information collected by us will only be used and disclosed for the purpose for which it was collected as set out below. This includes maintaining your account and contact details, providing you with our products and services, and processing payments.

- 4.2. Lilley Place may use Personal Information collected from you to provide you with information and updates on our services, additional products, or opportunities available to you.
- 4.3. We may use your deidentified Personal Information to improve our products and services and better understand your needs. Examples of this may be to understand the demographics and aggregate presenting concerns of our clients in order to inform clinician and staff recruitment needs or tracking average session numbers to ensure appropriate staffing.
- 4.4. We may from time to time use your Personal Information for another purpose where it would be reasonably expected by you or if permitted by the Privacy Act. This includes to effect or enforce a transaction, or procure advice from legal and accounting firms, auditors and other consultants.
- 4.5. Sensitive Information will only be used and disclosed for purposes consistent with providing care, such as when correspondence with other parties is requested or required by the schemes and frameworks under which you are attending. It may also be used as stipulated under your practitioner's Code of Ethics/Code of Conduct in situations such as preventing risk of harm to self or others.

5. **Disclosure of Your Data**

- 5.1. Lilley Place may disclose your Personal Information (but not Sensitive Information) to any of our officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.
- 5.2. Your Data may be disclosed to our suitably authorised employees insofar as reasonably necessary for the purposes set out in this policy. This includes through employee management of health information via our main enquiries email address, lilleyplace@lilleyplace.com.au, and associated email addresses for enquiries, directing client-clinician communication, and referral documentation.
- 5.3. Personal Information is only supplied to a third party when it is required for the delivery of our services, including in accordance with our AI Policy where written consent has been provided.
- 5.4. We may from time to time need to disclose Your Data to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
- 5.5. We may use Your Data to protect the copyright, trademarks, legal rights, property or safety of Lilley Place, www.lilleyplace.com.au, its clients or third parties.
- 5.6. We may also use and share aggregate or non-personally identifying information about clients for market analysis, research, marketing or other purposes.

- 5.7. We will not disclose, sell, share or trade your Personal Information to any third parties unless we first receive your consent, except as set out in this Policy.
- 5.8. We may provide health information (Sensitive Information) to third parties when reasonably necessary for the purposes set out in this policy. In other cases, we may provide it when consent has been sought in writing, such as when utilising our Information Exchange Form.
- 5.9. Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia.
- 5.10. If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer, to the extent permissible at law, our user databases together with any Personal Information, Sensitive Information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.
- 5.11. By providing us with your Data, you consent to the terms of this privacy policy and the types of disclosure covered by this policy. Where we disclose your Personal Information to third parties, we will request that the third party follow this policy regarding handling your personal information.

6. **Security of Your Data**

- 6.1. Lilley Place is committed to ensuring that your Data is secure.
- 6.2. Lilley Place will take reasonable steps to protect your Data from misuse, loss, unauthorised access and modification or disclosure. This includes advanced email anti-phishing protection software, routine password rotation, multi-factor authentication and cloud backup. Our preferred e-Referral Software is ISO 27001 certified, and our Practice Management Software is compliant with both Australian Privacy Principles and HIPAA.
- 6.3. Despite taking appropriate measures to protect your Data used and collected by us, please be aware that no data security measures can guarantee 100% security all of the time. The transmission and exchange of information is carried out at your own risk.
- 6.4. We cannot guarantee the security of your Data that you transmit to us or receive from us. Although we take measures to safeguard against unauthorised disclosures of your Data, we cannot assure you that your Data we collect will not be disclosed in a manner that is inconsistent with this privacy policy.
- 6.5. You are solely responsible for maintaining the secrecy of any passwords and other account information pertaining to our Platform, apps or services.

7. **Access to your Information**

- 7.1. You may request details of your Data that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth).
- 7.2. A small administrative fee may be payable for the provision of your Data. If you would like a copy of your Data which we hold about you or believe that any of your Data we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at lilleyplace@lilleyplace.com.au.
- 7.3. We reserve the right to refuse to provide you with your Data that we hold about you, in certain circumstances set out in the Privacy Act.

8. **Website**

- 8.1. When you visit the website of Lilley Place at www.lilleyplace.com.au, we do not collect information through Google Analytics, cookies or other means.
- 8.2. Our website provides an option to voluntarily supply information through a Plug-in connected to our Enquiry Form, which feed through to an email which is monitored by the Client Services/Referrals team.
- 8.3. Lilley Place does not take responsibility for any third-party links that are embedded on our website to provide information or resources, and the ways in which they may collect certain information from you.

9. **Marketing Emails**

- 9.1. We may send you bulk communication emails. These will mostly contain information about the service that we consider may be of interest to you.
- 9.2. If, at any time, you would like to stop receiving these promotional emails, you may contact us at lilleyplace@lilleyplace.com.au requesting to opt out. Please note that it may take up to 7 business days for us to process opt-out requests. If you opt-out of receiving emails or promotions from us, we still may send you emails about your account, any services you have requested or received from us, or for other customer service purposes. We do not provide your personal information to other organisations for the purposes of direct marketing.
- 9.3. If you receive communications from us that you believe have been sent to you other than in accordance with this Privacy Policy, or in breach of any law, please contact us using the details provided below.

10. **Complaints about privacy**

- 10.1. If you have any complaints about our privacy practices, please feel free to send in details of your complaints to:

lilleyplace@lilleyplace.com.au

10.2. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

11. **Changes to privacy policy**

11.1. Our Privacy Policy is subject to change.

11.2. Lilley Place may modify this policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website, or through distribution by email. Please check back from time to time to review our privacy policy.