

## Neutral Minds Psychology Privacy Policy as at 31 January 2026

### 1. Privacy Statement

**Neutral Minds Psychology ABN 58 246 730 238 (we, us, our)** considers your privacy to be important. This Privacy Policy (**Policy**) sets out how we collect, hold, use and disclose information about individuals who deal or interact with us. We treat all personal information collected by us in accordance with:

- (a) this Policy; and
- (b) applicable privacy laws in the jurisdictions in which we operate or in which our patients or clients are located including, but not limited to, the Australian *Privacy Act 1988* (Cth) and the applicable State or Territory legislation relating to the collection, use and disclosure of health information (collectively, **Privacy Laws**).

If there is any inconsistency between the Privacy Laws and this Policy, the Privacy Laws will prevail to the extent of the inconsistency.

### 2. Your Consent

By visiting our website [www.neutralmindspsychology.com.au](http://www.neutralmindspsychology.com.au) (our **Website**), enquiring about or engaging our services, filling out a contact form or otherwise communicating with us or providing information to us in any way, you consent to us collecting, processing, and using your personal and health information in accordance with this Policy.

### 3. Personal Information Collected by Us

Personal information is information or an opinion of an individual whose identity is apparent or can be reasonably ascertained. As part of our psychology business, we may collect personal information, including health information, from you.

We collect a variety of personal information that is reasonably necessary for the purposes of conducting and improving our business and products and services. This information may be collected in a number of ways, including:

- (a) through our Website and its subdomains, and various third party social media and messaging sites, pages, groups and forums, and other online services relating to our Site (collectively, our **Online Services**);

- (b) directly from you, including without limitation through conversations or correspondence to arrange an appointment, via a patient intake form or information sheet or during the course of providing health services to you;
- (c) from other healthcare or service providers;
- (d) through marketing research, including surveys and polls;
- (e) through any of our other business activities or events;
- (f) through a person seeking employment with us; and/or
- (g) by otherwise having some form of contact with a person, such as by personal contact, mail, telephone, email, video teleconferencing, Internet or other forms of telecommunication.

Personal information and personal health information collected by us may include:

- (a) your name and contact details (including street address, postal address, email address, phone number);
- (b) medical information including (without limitation) medical history, medical imaging, allergies, treatment history, care plans, medications and risk factors;
- (c) transactional information (including your method of payment);
- (d) identification documentation, Medicare information and private health insurance details (if applicable);
- (e) any other information that you choose to provide to us.

Except as outlined in this Policy, we endeavour to only collect personal information about you from you, where it is reasonable and practical to do so. Sensitive information will only be used and disclosed for the purpose for which it was collected by us or for a directly related secondary purpose.

## 4. Use of Personal Information

Generally, we use personal information for providing, evaluating, improving, personalising and developing our business, our health services, Online Services and our other products and services. More specifically, we use personal information for:

- (a) providing and delivering our services, including health services and treatments;
- (b) providing support to you in relation to the use of our health and other services;
- (c) management, training and research activities, including to improve our health and other services;
- (d) internal research and statistical purposes (including market segmentation and customer value analysis) and internal business operations (including fulfilling any legal requirements); and

- (e) enabling us to forward to you other information or material which we believe may be of interest to you, or which you have indicated you may be interested in receiving.

## 5. Disclosure of Personal Information

### 5.1 Disclosure generally

We do not disclose your personal information to any third party, other than those requiring this information to assist us or those that are directly related to the purposes for which the information was collected, including:

- (a) to external service providers, so that they can provide products and services in connection with the operation and improvement of our business including, without limitation, our professional advisors, consultants, administrators and data entry service providers;
- (b) to provide services to, or respond to or fulfill requests from, you including for claims and payments;
- (c) as permitted under the Privacy Laws or any other applicable law, which may include (without limitation):
  - (i) in the event of an emergency or your death, to notify or assist to notify a family member or person responsible for your care in relation to your medical condition;
  - (ii) to public health authorities for purposes related to preventing or controlling disease, injury or disability, reporting child abuse or neglect, reporting domestic violence, and reporting disease or infection exposure;
  - (iii) to coroners or medical examiners;
  - (iv) to appropriate persons in order to prevent or lessen a serious and imminent threat to the health or safety of a particular person or to the general public; and
  - (v) for military, national security, prisoner and government benefits purposes.
- (d) if you would reasonably expect that your personal information would be passed to the person to whom the personal information is disclosed;
- (e) any relevant authority or enforcement body where we reasonably believe that disclosure is required to bring legal action against a third party;
- (f) entities that we propose to merge with or be acquired by; and
- (g) with your consent.

## 5.2 **Online Services**

Our Online Services may be open to any other users to view. Any information you create or post in these locations may be available and accessible to other users of the Online Services.

Our Online Services may also enable you to upload, post, transmit, display, perform or distribute content, information or other data, which may include your personal information. Any information that you choose to disclose by means of such features becomes public information.

We strongly urge you to exercise caution when deciding to disclose your personal information by such means. You agree to assume all responsibility for all personal information that you have made public.

Your use of, and participation in, any Online Services is subject always to the terms of service, acceptable use policies, privacy policies, and other terms and conditions adopted by the relevant third party social media services and websites (such as Facebook, Instagram and YouTube).

Any information which you disclose on any third party social media services and websites is at your own risk and expense. We accept no liability or responsibility whatsoever in relation to the use, non-use or misuse of such third party social media services and websites by you or any other person.

## 6. **Protecting Your Personal Information**

We take reasonable steps to protect all personal information which we hold from misuse, interference, loss, unauthorised access, modification or disclosure.

The precautionary steps we take to protect personal information may include:

- (a) adopting measures to protect our computer systems, application software and networks for storing, processing and transmitting personal information;
- (b) adoption of procedural and personnel measures for limiting access to personal information by our staff;
- (c) regularly reviewing our information collection, storage and processing practices; and
- (d) secured encrypted servers, password protection for electronic files, multifactor authentication procedures, securing paper files in locked cabinets and physical access restrictions.

We also take steps to ensure that the personal information we collect is accurate, up-to-date and complete. These steps may include maintaining and updating personal information when it is apparent that updating is required, or we are otherwise advised by you that your personal information has changed.

Notwithstanding that we use our best endeavours to protect all personal information, we cannot completely guarantee the security of your personal information.

The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Policy.

## **7. Telehealth and Video Consultations**

We may offer telehealth services, including consultations conducted by video call, audio call and/or secure messaging, using third-party telehealth and video-conferencing platforms.

We take reasonable steps to ensure that any telehealth and video-calling platforms used by us are reputable, secure and appropriate for healthcare use. These platforms may be operated by third-party service providers and, in some cases, information may be stored or processed on servers located outside Australia.

Where your information is disclosed to overseas recipients (for example, where a telehealth platform uses offshore data hosting or support services), we take reasonable steps to ensure that the recipient handles your information in a manner consistent with Australian privacy laws, including the Australian Privacy Principles. In some circumstances, your information may be subject to the laws of other countries, which may not provide the same level of protection as Australian law.

Telehealth consultations are not routinely recorded by us. If a consultation is to be recorded for clinical, training or other lawful purposes, we will inform you and obtain your consent before doing so, unless recording is required or authorised by law.

While we take reasonable measures to protect your information, you acknowledge that no data transmission over the Internet is completely secure.

If you do not wish to use telehealth services, alternative consultation options may be available. Please contact us if you have any questions or concerns about our telehealth services.

## **8. Our Website**

When you visit our Website, we may collect certain information such as your mobile device's unique ID, the IP address of your mobile device, your mobile operating system, and the type of mobile internet browsers you use. This information is used in an aggregated manner to analyse how people use our Website so we can improve our service.

## 9. Cookies

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's or mobile device's storage drive.

Like many sites, our Website uses cookies and other similar technologies to collect information and remember your preferences. You can instruct your browser to refuse all cookies, or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some features of our Services or our other products and services.

## 10. Web Beacons

Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of users or to access cookies.

Unlike cookies which are stored on the user's computer or mobile device storage drive, web beacons are embedded invisibly on web pages (or in e-mail). Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages and to understand usage patterns.

Like many sites, our Website may use web beacons to collect information which is done in accordance with this Policy.

## 11. Overseas Disclosure

### 11.1 Overseas IT service providers

We may use outsourced information technology service providers in our business, including cloud software and data storage providers based overseas. Personal information (including health information) may pass through and/or be stored using these overseas service providers.

We will take reasonable steps to ensure such overseas service providers do not breach the Australian Privacy Principles contained in the Privacy Act (**APPs**), or are subject to laws or a scheme substantially similar to the APPs.

### 11.2 Analytics

We may use Google Analytics and other third party analytics software to track your usage of our Services. Google Analytics is a web analysis service provided by Google. Google utilises the data collected to track and examine the use of our Services, to prepare reports on its activities and share them with other Google services.

Google may use the data collected to contextualise and personalise the ads of its own advertising network. Personal information collected by Google includes cookies and usage data, which is processed in the United States of America (subject to changes in Google's data processing policies). You can find Google's privacy policy [on their website](#).

## 12. Third Parties

Our Online Services may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site which you visit.

We confirm that we have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third party sites, products or services whatsoever.

You should be aware that your ability to opt-out of a third party tool or platform will depend on the conditions governing your agreement with that third party.

## 13. Direct Marketing

We may use your personal information to notify you of services that we are able to offer you from time to time. You can opt out of receiving any marketing communications from us by following the opt out instructions in those communications.

## 14. Accessing and Managing Your Personal Information

### Right to Access

We will provide you with access to your personal information held by us, unless:

- (a) giving access would be unlawful; or
- (b) denying access is required under any applicable law.

If you wish to request access your personal information, please contact us at [admin@neutralmindspsychology.com.au](mailto:admin@neutralmindspsychology.com.au).

### Amendment of Personal Information

You can contact us to update or correct your personal information at [admin@neutralmindspsychology.com.au](mailto:admin@neutralmindspsychology.com.au).

Depending upon the personal information you seek to access, you may be asked:

- (c) to put your request in writing with evidence to verify your identity; and/or
- (d) to provide further details to assist us in responding to your request in a timely manner.

We will respond to a request for access to personal information within a reasonable period after the request is made (or such other period required by law).

If we elect not to correct your information, we will within a reasonable time (or such other period required by law) notify you of the reason for our refusal, the mechanisms available for you to complain about our refusal and such other matters required by the applicable Privacy Laws.

## 15. Complaints

We strive to ensure our compliance with this Policy and to regularly review our practices under it.

If at any time you have a complaint against us regarding our Policy, including a breach of the Privacy Laws, we invite you to contact us at [admin@neutralmindspsychology.com.au](mailto:admin@neutralmindspsychology.com.au). All complaints made will be dealt with in confidence. We endeavour to respond within 30 days of receipt of a complaint with a resolution or proposed resolution of the issue raised.

Please note that you may also make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of your personal information. Information on making a privacy complaint can be found on the [OAIC Website](#).

## 16. Variations

We reserve the right to vary this Policy from time to time without further notice to you. Any variations made will be updated on our Services. We will not reduce your rights under this Policy without using our best endeavours to first provide you with notice. It is your responsibility to check our Policy every now and again to ensure that you are aware of any changes made to it.

## 17. Further Information

For any further information about this Privacy Policy please contact us at [admin@neutralmindspsychology.com.au](mailto:admin@neutralmindspsychology.com.au).

# Neutral Minds Psychology Artificial Intelligence (AI) Policy as at 31 January 2026

## 18. Neutral Minds Psychology and the Use of AI

**Neutral Minds Psychology (we, us, our)** is committed to using AI to improve the health outcomes of patients, in a way that is legal, ethical and responsible. The purpose of this AI Policy is to create a set of guiding principles that comply with the legal and ethical obligations that govern the responsible use of AI tools by clinicians.

Neutral Minds Psychology takes the privacy of clients' information seriously, and our Privacy Policy sets out how we collect and treat your Personal Information and Sensitive Information. Our Privacy Policy and this AI Policy operate together.

This AI Policy deals with both the general principles Neutral Minds Psychology is committed to ensure the legal, ethical and responsible adoption and use of AI tools, as

well as guidelines for the AI tools used by Neutral Minds Psychology to ensure the use of those tools is of benefit to clients and promotes client health outcomes while protecting client data and information.

## 19. Definitions

In this Policy:

- (a) "AI" stands for artificial intelligence and refers to the capability of a machine to imitate intelligent human behaviour;
- (b) "AI tool" describes any software program that uses AI to perform tasks;
- (c) "Large language model" or "LLM" is a type of artificial intelligence model designed to understand, generate or manipulate human language. They are trained on very large amounts of text data and use statistics and machine learning techniques to generate text based on the input they receive;
- (d) "Generative AI" is a type of machine learning model that generates new content (for example, text, images, videos etc) as outputs.

## 20. Statement of Values and Ethics in the Use of AI

Neutral Minds Psychology believes that with appropriate policies in place, AI can support the delivery of healthcare outcomes. This includes the following:

- (a) Neutral Minds Psychology believes that human-delivered care must never be replaced by AI, but that AI has the potential to assist in care delivery and improve client outcomes. AI is seen by Neutral Minds Psychology as a means to achieving the goal of improved healthcare but can only support the psychologist and patient to reach this goal;
- (b) Improved patient health and well-being will always be the primary and guiding focus of the adoption of all AI tools by Neutral Minds Psychology. AI tools will only be adopted by Neutral Minds Psychology where this will genuinely contribute to improving health outcomes of patients;
- (c) The adoption and implementation of all AI tools by Neutral Minds Psychology will be patient-centred and used to benefit patients' health and well-being;
- (d) AI must never compromise the clinician's clinical independence or professional autonomy. A registered health practitioner or otherwise appropriately qualified clinician must always be ultimately responsible for decisions and communications and should have meaningful involvement at all stages of the patient journey;
- (e) All AI tools implemented by Neutral Minds Psychology must uphold and support the patients' rights to make their own informed healthcare decisions;
- (f) It is important to Neutral Minds Psychology to be accountable and transparent to patients, the health profession and the wider community about the use of AI in supporting clients' healthcare outcomes;

- (g) The application of AI in health care must never lead to greater health inequalities for any population;
- (h) Patients have the right to refuse to be involved in the use of AI at any time;
- (i) AI tools will only be adopted by Neutral Minds Psychology after first establishing robust and effective frameworks for managing risks which ensure patient safety and guarantee the privacy for all involved. These frameworks will be bespoke to the AI tool being adopted, and regularly and vigorously reviewed;
- (j) Neutral Minds Psychology will never establish protocols where the clinical independence of the clinician is undermined by AI or the final decision is made by a person in a non-clinical role with the aid of AI;
- (k) AI tools will not be used by administrative (non-clinical) staff.

## 21. Use of Client Data and Information

As outlined in our Privacy Policy, Neutral Minds Psychology may receive and store your Data. We are committed to the protection of the privacy of client health information. Neutral Minds Psychology will always use AI in accordance with the Privacy Policy in place at the relevant time.

- (a) Neutral Minds Psychology will only adopt and use AI tools following a careful review of that tool's approach to privacy, and has adopted a protocol of regular checking the tool to ensure there has been no material change to the way client data and information is stored, used and deleted.
- (b) AI tools will not be used, disclosing a client's personal or sensitive information, without written consent from the client.
- (c) The disclosure of Health Information must be limited to initiatives that exclusively aim to provide the health service to the client and/or improve the clients health outcomes. 1

## 22. Complaints about our AI policy

We strive to ensure our compliance with this Policy and to regularly review our practices under it.

If at any time you have a complaint against us regarding our Use of AI Policy, including a breach of the Privacy Laws, we invite you to contact us at [admin@neutralmindspsychology.com.au](mailto:admin@neutralmindspsychology.com.au). All complaints made will be dealt with in confidence. We endeavour to respond within 30 days of receipt of a complaint with a resolution or proposed resolution of the issue raised.

Please note that you may also make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of your personal information. Information on making a privacy complaint can be found on the OAIC Website.

## 23. Variations

We reserve the right to vary this Use of AI Policy from time to time without further notice to you. Any variations made will be updated on our Services. We will not reduce your rights under this Policy without using our best endeavours to first provide you with notice. It is your responsibility to check our Policy every now and again to ensure that you are aware of any changes made to it.

## 24. Current AI Tools in Use

Neutral Minds Psychology will maintain a list of AI tools in regular use by its clinicians. At present, Neutral Minds Psychology uses: **NovoNote AI Scribe**.

A summary of the AI tool adopted, how it is used and clinical justification for its adoption is set out below.

NovoNote AI Scribe, a note taking service that makes a record of what is said during a consultation and uses AI to automate the development of notes, correspondence and reports. The audio of a session is recorded into a transcription for the purpose of creating session summaries. Audio of the session is never saved. The clinician will also use NovoNote AI Scribe to generate correspondence and reports also. Neutral Minds Psychology and your clinician have found that Artificial Intelligence (AI) can support and improve the delivery of healthcare outcomes for the benefit of the client and clinician by promoting the ability of clinicians to focus more on conversation and less on recording notes during the session, enhancing the quality of care that clients may receive.

## 25. Further Information

For any further information about this Use of AI Policy please contact us at [admin@neutralmindspsychology.com.au](mailto:admin@neutralmindspsychology.com.au).