

Privacy

AIM

Skylight Mental Health is a South Australian community organisation which understands mental illness and responds with confidence, respect and hope. Your trust is important to us and we want to ensure that when you interact with us, and provide us with your details, you are fully aware of how your information may be used. We understand that protecting your personal information is important.

SKYLIGHT MENTAL HEALTH – PRIVACY POLICY

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through our mental health support services, our National Disability Insurance Scheme (**NDIS**) services and visiting our website, available at www.skylight.org.au (**Services**). In this Privacy Policy **we**, **us** or **our** means Skylight Mental Health Incorporated T/A Skylight Mental Health ABN 85 595 741 081.

Why do we collect and use your personal information?

We collect, hold, use and disclose personal information for the following purposes:

- to enable you to access and use our Services and associated social media platforms;
- to contact and communicate with you;
- for internal record keeping, administrative purposes, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms;
- to run promotions, competitions and/or offer additional benefits to you;
- for advertising and marketing, including to send you promotional information about our services and information that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have; and
- if you have applied for employment or to volunteer with us; to consider your employment or volunteer application.

What personal information do we collect?

The types of personal information we may collect about you include:

- your name;
- your contact details, including email address, mailing address, street address and/or telephone number;
- your age and/or date of birth;
- your credit card or payment details (through our third party payment processor);
- your preferences and/or opinions;
- with your consent, voice recordings and call data;
- information you provide to us through customer surveys;
- details of services we have provided to you and/or that you have enquired about, and our response to you;

- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Services, including through the use of Internet cookies, your communications with our online Services, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party;
- your sensitive information as set out below.

We may collect these types of personal information directly from you or from third parties.

COLLECTING YOUR SENSITIVE INFORMATION

What is sensitive information?

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles. **Sensitive information** means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation, sexual practices or sex life, criminal records, health information or biometric information.

What sensitive information do we collect?

The type of sensitive information we may collect about you includes:

- your NDIS plans and any other support plan you provide us with;
- your health information, including detailed information about your psychological health, disabilities, and health service usage;
- whether you have a criminal record;
- your racial or ethnic origin;

In providing our Services to you, we may collect any other sensitive information that you choose to share with us.

Your consent

We will not collect sensitive information about you without first obtaining your consent.

DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

We take the disclosure of your personal information very seriously. We will not disclose your personal information without your consent unless:

- to refer you to medical or health service providers in emergency circumstances where it is impractical for us to obtain your consent;
- we make a clinical decision that we must disclose your personal information to a third

party, based on an assessment of your best interests, taking into account your age, health, safety and any possible immediate or substantial risk to you;

- or in the situations outlined below.

We may disclose personal information to:

- the National Disability Insurance Agency (NDIA) as part of providing a service to you (for example, to provide updates on progress);
- third party auditors as part of a mandated NDIS provider audit;
- the NDIS Commission if compelled to as part of an investigation;
- third party service providers for the purpose of enabling them to provide their services, including (without limitation), IT service providers including our Customer Relationship Management provider, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators;
- our employees, volunteers, placement students, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you. This may include parties located, or that store data, outside of Australia; and
- third parties to collect and process data. This may include parties that store data outside of Australia.

By providing us with personal information, you consent to the disclosure of your information outside of Australia and acknowledge that while we seek only to deal with reputable organisations who comply with Australian Privacy Law, we cannot and we are not required to ensure that overseas recipients will handle that personal information in compliance with Australian Privacy law. You acknowledge that some overseas third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act and if any third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act and you will not be able to seek redress under the Privacy Act.

Disclosing your sensitive information

Provided you consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected, including:

- to enable us to verify your eligibility to use our Services;
- to enable us to provide our Services to you;
- to identify health crisis patterns and indicators;
- to refer you to medical or health service providers in emergency circumstances where it is impractical for us to obtain your consent;
- if authorised or required by applicable law;

- to provide a relevant third party with information about you, where we make a clinical decision that we must disclose your sensitive information to a third party, based on an assessment of your best interests, taking into account your age, health, safety and any possible immediate or substantial risk to you, for example if there is evidence of risk of harm to self and/or others or if there are safety concerns for any person under 18 years of age; and
- to enable an IT provider, such as our Customer Relationship Management provider or other third party to provide services to us, which may require disclosure of your personal information, including sensitive information. Any third party will only be provided access consistent with this privacy policy and in accordance with the Privacy Act 1988 (Cth).

For some services, you also agree that personal information (including sensitive information and health information) about you may be stored in an external clinical software environment of our commissioning organisation or funding body. Your information is used to enable:

- the provision of a health service;
- research and analysis;
- reporting; and/or
- the appropriate sharing of client personal information and service usage history between organisations for efficiency purposes, minimisation of duplicate records and client care.

YOUR RIGHTS AND CONTROLLING YOUR PERSONAL INFORMATION

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us and can remain anonymous, however, it may affect your use of our Services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct this information.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will ensure that a thorough investigation occurs and that you (or anyone acting on your behalf) are kept informed about the process and the outcome of the complaint.

You also have the right to contact the relevant authority, including lodging a complaint with the Federal Privacy Commissioner (www.oaic.gov.au or call 1300 363 992).

STORAGE AND SECURITY

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

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

COOKIES AND WEB BEACONS

We may use cookies on our online Services from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online Services with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our online Services.

We may use web beacons on our online Services from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time.

LINKS TO OTHER WEBSITES

Our Services may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

USE OF ARTIFICIAL INTELLIGENCE (AI)

Overview: We may use artificial intelligence and machine learning technologies, including AI technologies provided by third parties (**AI Technologies**) in our business operations and the provision of our Services. We will only use AI Technologies when legally permitted and necessary for our business operations.

How we use AI Technologies: We may use AI Technologies for the following purposes:

- to conduct analysis and processing;
- to improve and optimise our Services and operations;
- to automate certain processes and communications;
- for quality assurance purposes; and
- to assist with customer support and queries.

Data Protection and Security: Where we use service providers who provide AI Technologies to us, we will take reasonable steps to ensure that such service providers handle your personal information according to privacy law, including by ensuring that we have contracts in place requiring the service provider to protect personal information.

We will not input your personal information into any platform provided by an AI Technology service provider which then trains its model based on that information.

Your Rights and our Commitments: We will treat information generated or inferred by the AI Technologies about individuals as personal information and you maintain all rights over your personal information as outlined in this privacy policy, regardless of whether AI Technologies are used in processing. When using AI Technologies with your personal information:

- **Transparency and control:** we will inform you when AI Technologies are being used to make decisions that may significantly affect you. We will implement processes to verify the accuracy of AI-generated outputs and we will take reasonable steps to maintain human oversight and review of significant AI-generated decisions. Our staff are trained to understand the limitations of AI systems and verify outputs before they are relied upon; and
- **Security:** we implement appropriate technical and organisational measures to ensure that our use of AI Technologies maintains the security and integrity of your personal information. This includes regular testing and monitoring of AI outputs for accuracy and reliability, and not permitting our providers to train models with your personal information; and
- **Risk mitigation:** We regularly assess and document the risks associated with our use of AI Technologies in processing personal information and implement appropriate mitigation measures. This includes ongoing monitoring of AI Technologies and regular reviews of their performance and impact.

CALL RECORDINGS

Overview: With your consent, we may record telephone or video calls between you and our staff for the following purposes:

- for quality assurance and training purposes;
- to improve and optimise our Services and operations; and
- to automate certain processes and communications,

Consent and Notice: We will inform you at the beginning of each call when we intend to record and will give you the opportunity to terminate the call. You may withdraw consent or request that recording cease at any time during the call, though this may affect our ability to provide certain Services.

Your Rights and our Commitments: We will treat information recorded in any telephone or video calls as personal information and you maintain all rights over your personal information as outlined in this privacy policy.

AMENDMENTS

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact our Privacy Officer at:

Skylight Mental Health Incorporated T/A Skylight Mental Health ABN 85 595 741 081

Email: skylight@skylight.org.au

Approved: Chief Executive Officer (Paul Creedon):	
Last Reviewed:	July 2025