Management of Electronic Information Policies and Procedures

HiFlex Physio

Electronic Information covered under this policy are the following:

- Client personal information
- HiFlex Physio resources (e.g. policies and procedures)
- HiFlex Physio data (e.g. sales, earnings and reviews)

Financial Information covered under this policy are the following:

- Personal information of clients and people affiliated with HiFlex Physio (employees, partners, consultants and shareholders)
- Credit card information
- Credit ratings
- PayPal account details
- Reports (Purchases, Accounting, Sales, Expenses and Budgeting)
- Transaction Records

HiFlex Physio is committed to providing quality services, and this policy will show how the company protects the electronic information of HiFlex Physio, both from internal sources and external sources.

HiFlex Physio adopts the Australian Privacy Principles located within Privacy Act 1988. The Principles are the legal basis of which the company collects, uses, divulges, protects and discard of electronic information. A copy of the Australian Privacy Principles can be accessed here:

<https://www.oaic.gov.au/images/documents/privacy/privacy-resources/privacy-fact- sheets/privacy-fact-sheet-17-australian-privacy-principles_2.pdf>

This policy includes the electronic information of those who are part of the organisation, their partner organisations, their consultants, their clients and the shareholders. The policy also covers online and offline data.

HiFlex Physio aims to protect the electronic information covered by installing anti-virus software on the company computer units, using electronic information encryption and using password protection on each piece of electronic information.

HiFlex Physio will ensure that the electronic information that they are handling will be accurate and will take the necessary steps to keep the information up-to-date. HiFlex Physio will keep up-to-date versions of the electronic information by archiving the superseded versions.

In the event of a security breach, HiFlex Physio will do what is reasonably practicable in order to contain the events of the breach and assist the relevant departments and individuals involved to resolve the issue/s.

Electronic Information covered under this policy are the following:

- Electronic information collected by HiFlex Physio can include personal information from both clients and employees. HiFlex Physio is committed to ensuring that where this information is retained, it will only be used for internal management purposesthat are directly related to the management of its internal database.
- Electronic information stored by HiFlex Physio must also be accessed from computers within the network. External access to HiFlex Physio servers is prohibited.
- Out-of-date information will be stored for a minimum of five (5) years before permanent deletion from the HiFlex Physio server.
- Clients can withdraw their consent at any time. Once the request has been made, relevant HiFlex Physio personnel are responsible for deleting the client's personal information.

Procedures

A. Storing Electronic Information

- Relevant personnel must use the appropriate files formats when creating or saving electronic information.
- Ensure that the information is up-to-date and without errors before storage.
- Electronic information must be stored using the appropriate folders in local drives and/or in designated cloud storage areas. Relevant personnel must use their HiFlex Physio email accounts to store files in the following cloud storage applications:
  - Dropbox
  - Google Drive

  Relevant personnel must request access from their direct supervisors when accessing the relevant folders for the first time.
- Outdated files must be archived in the Archive folder. Files in the Archive folder will be permanently deleted after 5 years.

B. Maintaining Protections on HiFlex Physio Electronic Information

- All new computers coming into HiFlex Physio must have anti-virus programs immediately installed on them before use. IT personnel must also ensure that the anti- virus programs installed on HiFlex Physio computers are still up-to-date.
- Password protected documents stored in the HiFlex Physio database must be updated at least once every month.

C. Electronic Information Security Breaches

- Report the security breach to the IT Department and authorities, where necessary, and provide them with all relevant information requested. Private information, including names and contact details of clients involved, will require a written request and approval from the Centre Manager.

- Inform the individuals/entities whose electronic information was involved in a security breach.
- HiFlex Physio will investigate what caused the breach and create a report on the outcomes of the investigation to be distributed personnel, including clients, involved in the breach.

Financial Information Policy

- Storing financial information.

  Financial information collected by HiFlex Physio is stored in an isolated server, that can only be accessed by the following personnel:

  - Data Entry Typist or Office Assistant
  - General Manager – Finance

  This information can only be accessed in the event of recurring bulk client purchases or dispute.

- Financial information stored by HiFlex Physio that has been out of use for a minimum of six (6) months will be permanently deleted from the isolated server.

Procedures

A. Storing Financial Information

- Relevant personnel must use the appropriate files formats when creating or saving electronic information.
- Ensure that the information is up-to-date and without errors before storage.
- Electronic information must be stored using the appropriate folders in local drives and/or in designated cloud storage areas. Relevant personnel must use their HiFlex Physio email accounts to store files.
- Outdated files must be archived in the appropriate folder. Outdated files in the Archive folder will be permanently deleted after six (6) months.

B. Maintaining Financial Information

- All new computers coming into HiFlex Physio must have anti-virus programs immediately installed on them before use. IT personnel must also ensure that the anti- virus programs installed on HiFlex Physio computers are still up-to-date.
- At the point of purchase, clients have the option to have HiFlex Physio delete their records of any financial data once payment has been processed. If they are:

  - Completing a transaction through an online portal, clients must tick the “Forget payment method” option
  - Completing a transaction through HiFlex Physio centres, they must complete the appropriate Client Waiver Form

- Password protected documents stored in the HiFlex Physio database must be updated at least once every month.