

Approved by: Samantha Putkunz
Version: 3.0
Date: 06 May 2026
Review: Annually

CONTENTS

1. Purpose and Scope..... 2

2. Personal Information We Collect 2

3. How We Collect Information 2

4. Why We Collect and Use Your Information 3

5. Lawful Basis for Processing Your Information..... 4

6. Cookies and Website Tracking 5

7. Disclosure of Personal Information..... 5

8. Security of Personal Information 5

9. Automated Decision-Making 6

10. Notifiable Data Breaches 6

11. NDIS Participant Rights 6

12. Accessing, Correcting and Requesting Deletion of Your Information 6

13. Complaints and Contact 7

14. Changes to this Policy 8

15. Privacy of Children and Young People..... 8

16. Review, Compliance, and Contact 8

1. PURPOSE AND SCOPE

Rehab Hire & Sales and Rehab Installation operate in one of the most information-sensitive sectors in the Australian healthcare landscape. Our client base spans NDIS participants, TAC and WorkSafe claimants, DVA recipients, palliative care patients, aged care clients, and individuals whose health information, disability status, home environments, and funding arrangements are legally classified as sensitive personal information under the Privacy Act 1988 (Cth).

We are also trusted by occupational therapists, allied health professionals, hospitals, and support coordinators who refer their clients to us. When a clinician refers a client, they are entrusting us with information they have collected under their own professional and ethical obligations. We take that responsibility seriously.

This Policy applies to all personal information handled by Rehab Hire & Sales and Rehab Installation in connection with our services, including rehabilitation equipment hire and sales, complex and standard assistive technology, home modifications and accessibility installations, NDIS service delivery, TAC, WorkSafe Victoria, DVA, Home Care Packages, palliative care supports, and aged care contracts. It applies to all staff, contractors, subcontractors, clients, referrers, and website visitors.

This Policy is publicly available at rehabhire.com.au/company-policies and rehabinstallation.com.au and is accessible to participants, clients, referring professionals, staff, and contractors. If you have any questions about this Policy or how we handle your personal information, contact us directly using the details in Section 13.

2. PERSONAL INFORMATION WE COLLECT

The personal information we work with typically reaches us through referring professionals, occupational therapists, physiotherapists, GPs, hospital discharge teams, support coordinators, and funding bodies, as part of the clinical referral and service delivery process.

We receive this information as part of a trusted clinical chain and use it solely to deliver the service for which you were referred. This spans the full breadth of what complex healthcare and home modification services require: physical and mental health history, clinical assessments, hospital discharge summaries, seating and postural evaluations, funding documentation, hire and loan agreements, equipment servicing and maintenance records, property information, photographs, carer and family details, insurance and liability files, incident reports, and correspondence between treating professionals, funders, and our team. It is never used for any secondary purpose, shared beyond what your service requires, or retained beyond the period necessary to fulfil our legal and regulatory obligations.

3. HOW WE COLLECT INFORMATION

In most cases, we do not collect personal information directly from clients. Information typically reaches us from referring occupational therapists, allied health professionals, GPs, hospital discharge teams, support coordinators, case managers, and funding bodies, including the NDIA, TAC, WorkSafe Victoria, DVA, and My Aged Care, through an established clinical or funding referral process.

When clients, families, or professionals contact us directly by phone, email, through our website enquiry or contact forms, or via our social media channels, we collect only what is necessary for the enquiry or service requested. When purchases are made through our website, we collect the information necessary to process and fulfil the order, including contact, delivery, and payment details.

We also provide a secure online portal through our website for use by hospitals and health services. Information submitted through this portal, including client referral details, equipment requests, and clinical information, is collected and handled in accordance with the access agreements in place with each institution and the terms of this Policy.

We also collect contact and professional details from occupational therapists, health professionals, and industry contacts at trade shows, conferences, and events we attend or exhibit at. Information collected in these settings is used only to follow up on the conversation that took place and, where relevant, to keep professionals informed of products and services relevant to their practice.

Our website also collects certain information automatically through cookies and analytics tools, as described in Section 6.

4. WHY WE COLLECT AND USE YOUR INFORMATION

We collect, hold, use and disclose personal information only for the purposes for which it was provided and what is reasonably necessary to deliver our services.

This includes:

- Assessing clinical referrals, matching equipment or home modifications to an individual's specific functional needs, and ensuring the right solution is prescribed and delivered safely
- Processing hire agreements, loan arrangements, sales, service agreements, repairs, and equipment maintenance
- Submitting, managing, and following up funding claims and prior approvals with the NDIA, TAC, WorkSafe Victoria, DVA, Home Care Package providers, and other funding bodies on behalf of clients
- Communicating with referring occupational therapists, allied health professionals, support coordinators, and health services regarding client orders, deliveries, trials, and service outcomes
- Meeting our obligations as a registered NDIS provider, registered domestic building contractor under the Victorian Building Authority, and employer under applicable Australian law
- Managing quality, complaints, incidents, and continuous improvement across our services

5. LAWFUL BASIS FOR PROCESSING YOUR INFORMATION

The table below sets out the lawful basis under the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) for processing each category of personal information. For sensitive information, including health information, we rely on legal obligation and legitimate interests within the clinical referral chain unless otherwise required by law.

Data Type	What It Includes	Lawful Basis (Privacy Act 1988)
Contact Information	Name, address, phone, email, emergency contacts	Contractual necessity, to deliver services and communicate with you; Legitimate interests, account and relationship management
Health, Disability and Clinical Information	Physical and mental health history, diagnoses, functional assessments, OT prescriptions, hospital discharge summaries, seating evaluations, equipment trial outcomes, clinical correspondence	Legal obligation, required for NDIS, TAC, WorkSafe, DVA, and health service delivery; Legitimate interests, received as part of an established clinical referral chain for the sole purpose of delivering the referred service
Funding Scheme Details	NDIS plan, TAC claim number, DVA number, Home Care Package details, prior approvals	Contractual necessity, to process claims and approvals on your behalf; Legal obligation, funding body requirements
Financial and Payment Information	Bank details, credit card, invoices, payment records	Contractual necessity, to process payments; Legal obligation, Australian tax and accounting law
Property and Home Information	Residential address, building assessments, modification plans, structural details, photographs	Contractual necessity, to design and deliver home modifications; Legal obligation, Building Act 1993 (Vic), National Construction Code, VBA registration requirements
Carer, Family and Support Network Information	Carer contact details, family member details, support worker information	Contractual necessity, where carers or family are involved in service delivery or equipment setup
Staff and Contractor Information	Employment records, qualifications, licences, VBA and trade registrations, tax and superannuation details	Contractual necessity, employment and engagement obligations; Legal obligation, Fair Work Act, Superannuation Guarantee, VBA registration
Website and Digital Information	IP address, pages visited, browser type, cookies, enquiry form submissions, portal activity	Legitimate interests, to operate and improve our website and portal; Consent, via cookie banner for non-essential analytics and marketing cookies

Where we rely on your consent to process sensitive information, you have the right to withdraw that consent at any time. Withdrawing consent may affect our ability to provide services to you. Please contact us using the details in Section 13 to discuss.

6. COOKIES AND WEBSITE TRACKING

Our website uses cookies and analytics tools to operate effectively and to understand how it is being used. When you first visit our website, a cookie banner will ask you to select your preferences. Essential cookies are always active as they are required for the site to function. Non-essential cookies, including analytics and marketing cookies, are only activated with your consent.

We use Google Analytics to understand how our website is used, including which pages are visited, how long users stay on the site, and referral sources. This data is aggregated and does not identify individual users. We may also use Google and Meta cookies for remarketing purposes, which means people who have previously visited our website may see our advertisements on other platforms. Our website also automatically collects log data, including IP addresses and browser information, for security and performance monitoring.

You can manage your cookie preferences at any time using the cookie settings link in our website footer, through your browser settings, or by opting out of Google Analytics at analytics.google.com/analytics/web/optout

7. DISCLOSURE OF PERSONAL INFORMATION

We disclose personal information only where it is directly necessary to deliver your service or meet a legal obligation. We do not disclose more than is required for each specific purpose, and we do not disclose to any party whose involvement is not necessary to your service.

Depending on the nature of your service, this may include disclosure to:

- The NDIA, TAC, WorkSafe Victoria, DVA, My Aged Care, and other relevant funding bodies, to process claims, obtain prior approvals, and meet reporting obligations
- Your referring occupational therapist, allied health professionals, support coordinator, or treating health service, where communication about your service is clinically necessary
- Equipment suppliers and manufacturers, where required to source, configure, service, or fulfil warranty obligations for specialist equipment
- Building certifiers, local councils, the Victorian Building Authority, and other regulatory bodies, where required for home modification permits and approvals
- Landlords, property managers, or strata and body corporate managers, where written consent to carry out modifications must be obtained
- Cloud software and IT service providers who support our business operations, all of whom are engaged under confidentiality obligations
- Legal, financial, and regulatory bodies where disclosure is required by law

We do not sell, rent, or trade your personal information under any circumstances. We do not use your information for marketing purposes without your separate consent. Your information is not transferred or stored outside Australia without your knowledge, except where a funding body or regulatory requirement specifically requires it, in which case we will advise you.

8. SECURITY OF PERSONAL INFORMATION

We take the security of personal information seriously, particularly given the sensitivity of the health, disability, and funding information we handle on behalf of our clients and their treating professionals. Access to personal information is restricted to staff and contractors with a direct role in the relevant service, and all staff are subject to confidentiality obligations as a condition of their engagement with us.

Physical records containing personal information are stored in locked cabinets at a separate location accessible only to Directors and the Managing Partner. When no longer required, physical records are destroyed by shredding. We use secure, Australian-hosted cloud systems, role-based access controls, and multi-factor authentication across our business platforms. We conduct regular staff training on privacy and data security obligations.

We maintain a formal Information Security Policy and an Artificial Intelligence Policy that detail our technical and operational security practices and our governance of AI tools. Neither document is used for automated decision-making involving clients. Both policies are available on request by contacting the Managing Partner or the ICT Team; details are in Section 14.

9. AUTOMATED DECISION-MAKING

We do not use automated decision-making processes or profiling that produce legal or similarly significant effects on you. All decisions relating to your service delivery, equipment prescription, funding claims, or eligibility assessments involve human review by our staff or your treating health professionals. If this changes in the future, we will update this Policy and notify affected clients.

10. NOTIFIABLE DATA BREACHES

We are subject to the Notifiable Data Breaches (NDB) scheme under Part IIIIC of the Privacy Act 1988 (Cth). In the event of an eligible data breach likely to result in serious harm, we will contain the breach and assess risk, notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as soon as practicable, and take immediate steps to remediate and prevent recurrence.

We maintain an internal Security Incident and Breach Response process, overseen by the Managing Partner and ICT Team, which governs how breaches are identified, escalated, and resolved. If you believe your personal information has been compromised, contact us immediately using the details in Section 14.

11. NDIS PARTICIPANT RIGHTS

As a registered NDIS provider, we are bound by the NDIS Practice Standards, the NDIS Code of Conduct, and the National Disability Insurance Scheme Act 2013 (Cth). The NDIS Code of Conduct recognises privacy as a fundamental human right. We take that seriously.

NDIS participants have the following rights in relation to their personal information:

- The right to be informed about what personal information we collect, why we collect it, how it is stored and used, and who it may be disclosed to, in language and terms that are accessible and easy to understand
- The right to agree to, or withhold agreement to, the collection and use of their personal information, and to withdraw or amend that agreement at any time
- The right to be informed of the specific circumstances in which their information may be disclosed without their consent, including where disclosure is required or authorised by law, where it is necessary to prevent serious harm, or where a funding body requires it as a condition of service delivery
- The right to access the personal information we hold about them and to request corrections if that information is inaccurate, incomplete, or out of date
- The right to have their personal information handled with dignity, respect, and confidentiality always
- The right to make a complaint about how we have handled their personal information, without fear of impact on their service

We provide a plain-language Privacy and Confidentiality summary for NDIS participants on request, written in accessible language in accordance with NDIS Practice Standard Outcome 1.3. If you would like a copy or to discuss your privacy rights, contact us using the details in Section 13.

Participants may also raise concerns directly with the NDIS Quality and Safeguards Commission at ndiscommission.gov.au or 1800 035 544.

12. ACCESSING, CORRECTING AND REQUESTING DELETION OF YOUR INFORMATION

You have the right to request access to the personal information we hold about you, and to request corrections if that information is inaccurate, incomplete, or out of date. You may also request that we delete personal information we hold about you.

We will respond to all requests within 30 days. Where we are unable to fulfil a deletion request, we will advise you in writing and explain why. Certain information must be retained to meet our legal obligations under the NDIS, TAC, WorkSafe, DVA, aged care, and building regulation record-keeping requirements, and we will be transparent with you about which information falls into that category.

We make it easy to get in touch. To make a request, reach us through any of the following:

- Complete the feedback form on our website at rehabhire.com.au/download-forms
- Email us at techservices@rehabhire.com.au
- Send us a message via the live chat on our website
- Call us on 1300 000 030

13. COMPLAINTS AND CONTACT

If you have concerns about how we have handled your personal information, we want to hear from you. We take all privacy complaints seriously and will respond promptly.

NDIS Services

For complaints or requests relating to NDIS participant information and service delivery, please use our dedicated NDIS Complaint Form. Complaints are treated confidentially. We will not retaliate or disadvantage anyone who raises a concern. We will acknowledge your complaint within 2 business days and aim to resolve it within 20 business days. We will notify the NDIS Commission of any reportable incident.

- Download and complete our NDIS Complaint Form at rehabhire.com.au/ndis-info
- Email us at ndis@rehabhire.com.au
- Send us a message via the live chat on our website
- Call us on 1300 000 030
- Write to us at 320 Lorimer Street, Port Melbourne VIC 3207

NDIS participants may also escalate directly to the NDIS Quality and Safeguards Commission at ndiscommission.gov.au/complaints, by calling 1800 035 544, or by writing to NDIS Quality and Safeguards Commission, PO Box 210, Penrith NSW 2751. Where an NDIS participant is a child or young person under the age of 18, please refer to Section 15 for information about how we handle the privacy of children and young people.

Equipment Hire

For complaints or requests relating to equipment hire, loan agreements, and hire agreements. We will acknowledge your complaint promptly and respond within 30 days.

- Complete the feedback form on our website at rehabhire.com.au/download-forms
- Email us at contact@rehabhire.com.au
- Send us a message via the live chat on our website
- Call us on 1300 000 030
- Write to us at 320 Lorimer Street, Port Melbourne VIC 3207

Equipment Sales

For complaints or requests relating to equipment purchases, orders, and deliveries. We will acknowledge your complaint promptly and respond within 30 days.

- Complete the feedback form on our website at rehabhire.com.au/download-forms
- Email us at sales@rehabhire.com.au
- Send us a message via the live chat on our website
- Call us on 1300 000 030
- Write to us at 320 Lorimer Street, Port Melbourne VIC 3207

Repairs and Service

For complaints or requests relating to equipment servicing, repairs, and maintenance. We will acknowledge your complaint promptly and respond within 30 days.

- Visit our repairs and service page at rehabhire.com.au/repairs-and-service
- Email us at service@rehabhire.com.au
- Send us a message via the live chat on our website
- Call us on 1300 000 030
- Write to us at 320 Lorimer Street, Port Melbourne VIC 3207

Rehab Installation | Home Modifications

For complaints or requests relating to home modification and accessibility installation services. We will acknowledge your complaint promptly and respond within 30 days.

- Contact us via our website at rehabinstallation.com.au
- Email us at contact@rehabinstallation.com.au
- Send us a message via the live chat on our website
- Call us on 1300 000 030
- Write to us at 320 Lorimer Street, Port Melbourne VIC 3207

If you are not satisfied with our response across any of our services, you may escalate your complaint to the Office of the Australian Information Commissioner at oaic.gov.au or 1300 363 992.

14. CHANGES TO THIS POLICY

We review and update this Privacy Policy periodically to reflect changes in our services, legal obligations, or best practice. The current version, including its version number and effective date, is always published at rehabhire.com.au/company-policies and rehabinstallation.com.au

15. PRIVACY OF CHILDREN AND YOUNG PEOPLE

Some of the people we provide services to are children or young people under the age of 18. Where we receive personal or health information about a child, that information is handled with the same care and confidentiality as all other personal information, and in accordance with the additional protections afforded to children under the NDIS Practice Standards and applicable Australian law.

Where consent is required in relation to a child's personal information, we work with the child's parent, legal guardian, or authorised representative. We do not collect more information about a child than is necessary to deliver the service for which they have been referred.

16. REVIEW, COMPLIANCE, AND CONTACT

This Policy will be reviewed annually or following a significant security incident.

Queries should be directed to:

Samantha Putkunz
Managing Partner



320 Lorimer Street, Port Melbourne VIC 3207

t: 1300 000 030

e: contact@rehabhire.com.au