[INSERT PB PERFORMANCE LOGO]

PB PERFORMANCE PTY LTD
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1–3 Weeroona Avenue, North Bendigo VIC 3555
Phone: 0422 254 969 | reception@pbperformancehealth.com.au

Privacy Policy & Lead Collection Notice

Compliance with the *Privacy Act 1988* (Cth), the Australian Privacy Principles (APPs), the *Spam Act 2003* (Cth), and the *Health Records Act 2001* (Vic).

> **Important Notice:** PB Performance PTY LTD operates as an allied health and fitness facility providing physiotherapy, exercise physiology, strength and conditioning, supervised classes, open gym access, and extended hours (5:00 am – 10:00 pm). We handle sensitive clinical records and prospective member data in strict accordance with statutory standards.

1. Purpose and Scope

This document outlines how PB Performance PTY LTD collects, uses, stores, discloses, and protects personal information, sensitive health information, and digital marketing inquiries. It applies to all current clients, gym members, casual visitors, participants in funding schemes (NDIS, TAC, WorkCover, DVA, Medicare EPC/CDM, My Aged Care), minors under 18 years of age, and individuals who submit digital inquiries via online advertising or lead generation forms.

2. Types of Information Collected

We collect personal information necessary to deliver clinical healthcare, deliver safe exercise coaching, process memberships, and respond to direct inquiries.

Category	Data Items Collected	Primary System / Storage
General & Account Details	Full name, date of birth, residential address, telephone number, email address, and emergency contact details.	Zanda (clinical), GymMaster (members), Google Workspace.
Sensitive Health Data	Medical history, pathology, clinical assessments, treatment notes, rehabilitation progress, and referral documents.	Zanda (encrypted, password-secured, mandatory 2FA).
Biomechanical & Performance Testing	Force plate metrics, dynamometry data, strength and range of motion assessments, and conditioning programs.	VALD Performance Testing Systems (password-protected).
Lead & Marketing Inquiries	Name, date of birth, email address, telephone number, and general enquiry notes ("How can we help").	Zapier automation, Google Workspace, reception email.
Billing & Payments	HICAPS terminal claims, private health fund details, third-party claim numbers, automated direct debits via Square.	HICAPS terminal, Square integration via GymMaster.
Premises & Facility Access	Closed-Circuit Television (CCTV) security footage within gym areas, and electronic key fob door logs (5:00 am – 10:00 pm).	On-premise secure server & GymMaster access control logs.

3. Digital Advertising, Leads, and the Spam Act 2003 (Cth)

PB Performance runs digital advertising across Meta platforms (Facebook, Instagram) and Google. Prospective clients submit contact forms either through in-platform instant forms or landing pages.

- **Lead Ingestion & Automation:** When an individual submits a lead form on Meta or Google, details (Name, DOB, Email, "How can we help") are processed via Zapier and securely transmitted to our reception email (reception@pbperformancehealth.com.au) and logged within Google Workspace for administrative outreach.
- **Website & Pixel Tracking:** We utilize Meta Pixel and analytics tags to evaluate advertising effectiveness. This data is collected on an aggregated, pseudonymous basis to optimize ad delivery and does not expose private clinical records.
- **Consent Mechanisms:** Form submissions require an explicit, un-ticked opt-in checkbox confirming agreement to be contacted and to receive promotional communications.
- **Direct Communication:** Prospective leads may receive a direct telephone call or SMS from our staff to discuss their inquiry, followed by periodic updates or educational newsletters delivered via Mailchimp.
- **Unsubscribe & Opt-Out Rights:** All marketing emails sent via Mailchimp include a clear, functional one-click unsubscribe mechanism. Individuals who opt out or request cessation of SMS/telephone communications are processed within **5 business days** at no cost, in full compliance with the *Spam Act 2003*.

4. Clinical Information Handling, Minors & Third-Party Referrers

Health information is classified as sensitive under APP 3. We maintain strict safeguards over clinical data:

- **Internal Clinical Sharing:** Clinical records are shared between internal practitioners (physiotherapists, exercise physiologists, strength coaches) strictly on a need-to-know basis to ensure multi-disciplinary continuity of care, subject to prior client consent.
- **External Disclosure:** Clinical progress notes, medical reports, or assessment findings are shared with external medical practitioners, general practice referrers, or funding bodies (NDIS, TAC, WorkCover, DVA, Medicare, My Aged Care) **only with explicit, documented client consent**, or where required by law.
- **Minors (Under 18 Years):** When delivering allied health or fitness services to minors, collection and disclosure consent is obtained from a parent, legal guardian, or appointed trustee, with treatment notes retained in accordance with Victorian statutory health retention guidelines.

5. Data Security, Retention & Cross-Border Transfers

PB Performance takes physical, technical, and operational precautions to protect all stored information from misuse, interference, loss, unauthorized access, modification, or disclosure:

- **Authentication:** All administrative and practitioner access to Zanda and Google Workspace is secured by unique credentials and mandatory Two-Factor Authentication (2FA). VALD Performance systems operate behind secure credential controls.
- **Facility Access:** Extended access (5:00 am – 10:00 pm) is restricted to registered key fob holders, with CCTV surveillance installed throughout open gym areas for personal safety, asset protection, and liability prevention.

- **Record Retention:** In compliance with the *Health Records Act 2001* (Vic), adult clinical records are securely retained for a minimum of 7 years from the date of last treatment. Records for individuals under 18 years of age at the time of care are retained until the individual reaches 25 years of age.
- **Third-Party Cloud Providers (APP 8):** We utilize reputable software vendors (Zanda, GymMaster, Google Workspace, Mailchimp, VALD, Zapier, Square). Where data is hosted or processed on offshore cloud infrastructure, reasonable steps are taken to ensure the overseas recipient complies with standards comparable to the Australian Privacy Principles.

6. Access, Correction, and Privacy Complaints

Under the APPs, individuals have the right to request access to their personal and health information and to request corrections if the information held is inaccurate, out of date, or incomplete.

Privacy Officer & Feedback Contact:
Patrick Blood — Owner / Director
PB Performance PTY LTD
1–3 Weeroona Avenue, North Bendigo VIC 3555
Phone: 0422 254 969
Email: reception@pbperformancehealth.com.au

If you submit a privacy inquiry or complaint, we will investigate and provide a formal response within 30 days. If you are dissatisfied with our response, you may escalate the matter to the Office of the Australian Information Commissioner (OAIC) via oaic.gov.au or call 1300 363 992, or the Victorian Health Complaints Commissioner (HCC).