

## Data Handling Summary:

Veracity Training & Counselling (VTAC) is committed to protecting the privacy, confidentiality, and security of personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth).

This statement is a plain-English summary of how We handle information. It does not replace or override Our Privacy Policy.

This summary should be read together with Our Privacy Policy and relevant Terms and Conditions. Where there is any inconsistency, the Privacy Policy prevails to the extent necessary to ensure compliance with applicable privacy laws.

### 1. Collection of Information

We collect personal information directly from individuals engaging with Our Services, including Clients, Participants, and, where applicable, Contracting Parties who book, arrange, or pay for Services on behalf of others. This may occur through Our website, booking systems, forms, and direct communication. The type and extent of information collected depends on the nature of the Services. Where counselling services are provided, information relating to the counselling relationship (including Sensitive Information) is collected from and relates to the Client receiving those services, and is handled in accordance with Our Privacy Policy and applicable privacy laws. We collect only the information that is reasonably necessary for the provision of Our Services, associated administration, communication, record-keeping, legal compliance, and related business functions.

### 2. Use and Disclosure

Personal information is used for service delivery, communication, administration, and compliance with program or regulatory requirements (including issuing bodies such as Mental Health First Aid). We may disclose personal information to trusted third-party service providers who support these functions (for example, payment processing, secure communications, data storage, and practice management systems). Where counselling services are provided, personal information relating to the counselling relationship (including Sensitive Information) is subject to strict confidentiality obligations. Such information will not be disclosed to a Contracting Party or any other person unless the Client has provided their own informed consent or disclosure is otherwise required, authorised, or permitted by law.

### 3. Third-Party Systems

We use reputable platforms including website hosting, booking systems, customer relationship management tools, cloud storage, and practice management systems. These providers support the delivery, administration, and security of Our Services. Further information about how these systems handle personal information, including where data may be stored or processed, is set out in Our Privacy Policy. We take reasonable steps to ensure that any third-party providers engaged by Us handle personal information in a manner consistent with applicable privacy obligations, and We remain responsible for Our own obligations in relation to personal information handled in connection with Our Services.

### 4. Overseas Processing

While We prioritise Australian-based data hosting where available, some service providers operate globally and may store or process personal information outside Australia, as described in Our Privacy Policy. Where We disclose personal information to an overseas recipient, We take reasonable steps to ensure that such information is handled consistently with applicable privacy obligations. Where the information includes Sensitive Information collected in connection with counselling services (including health information, clinical records, or clinical notes), any overseas disclosure will be subject to the Client's explicit and informed consent where required by applicable law. Such consent is obtained through Our Intake and Consent Form or otherwise where appropriate and permitted by law. Engagement with Our Services or acceptance of Our Terms alone does not constitute consent for overseas disclosure of Sensitive Information.

### 5. Data Security

We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access. This includes using secure platforms, access controls, and limiting data collection to what is necessary.

### 6. Sensitive Information

Where tools are used to support service delivery (for example, clinical documentation or transcription tools), such tools are configured to process information only for the purpose of generating clinical or administrative records. Where real-time transcription is used in connection with counselling services, audio is transcribed as it occurs and is not retained as part of

the Client record once transcription has occurred. Draft transcripts or draft notes may be reviewed for the purpose of preparing clinical documentation; however, to the extent permitted by the platform functionality, Our recordkeeping practices, and applicable law, We retain only the clinical notes, finalised documentation, and any transcript or extract that We reasonably determine is necessary for clinical documentation, supervision, related practice administration, or legal compliance. Sensitive Information is collected, used, and disclosed only where reasonably necessary for the provision of Services and in accordance with applicable privacy laws and Our Privacy Policy. Where required by law, We obtain explicit and informed consent for the collection and handling of Sensitive Information, including any use of clinical tools or overseas disclosure.

## **7. Transparency**

Further details about how We manage personal information, including specific service providers and data handling practices, are available in Our Privacy Policy and internal data governance documentation.

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### **Contact Us**

If You have any questions or concerns about this **Data Handling Summary**, please contact Us at Veracity Training & Counselling; Email: [info@vtac.life](mailto:info@vtac.life).

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