CRL Osteopathy

PRIVACY POLICY

Effective 17 September 2026

This policy explains how CRL Osteopathy manages personal information and health information in the course of providing osteopathic care. It is intended to reflect our obligations under the Privacy Act 2020, the Health Information Privacy Code 2020 and other applicable New Zealand requirements.

In this policy, **we**, **us** and **our** mean CRL Osteopathy. The practice is operated by Casey Liddington, Registered Osteopath, from inside Snap Fitness Bishopdale, Christchurch. CRL Osteopathy is an ACC-registered provider and offers Southern Cross Easy-Claim.

1. Our privacy responsibility

Casey Liddington is the Privacy Officer for CRL Osteopathy. The Privacy Officer oversees privacy questions, access and correction requests, and concerns about the handling of information. Contact details appear at the end of this policy.

2. Information connected with your care

We collect only the information reasonably needed to operate the practice, arrange appointments, provide appropriate care and meet professional or legal responsibilities.

Identification and contact details

- Your name, date of birth, address and contact details.
- Emergency-contact information and, where relevant, parent, guardian or representative details.
- Details of your GP and other health professionals involved in your care.

Clinical information

- Your health history, current symptoms, injuries and relevant lifestyle or activity information.
- Assessment findings, clinical notes, treatment delivered and your response to care.
- Management plans, exercises, recommendations, referrals, reports, imaging and correspondence.

Administrative and payment information

- Booking history, appointment communications, invoices, receipts and payment status.
- ACC claim details, including information needed to lodge, check or administer a claim.
- Information required to process Southern Cross Easy-Claim or another authorised insurance claim.

3. How information reaches us

Most information is provided directly by you when you book, complete a form, speak with us or attend an appointment. We may also receive relevant information from ACC, an insurer, your GP, another health practitioner, an imaging provider, a parent or guardian, an authorised representative, or a booking or health-service platform.

When information is collected from another source, CRL Osteopathy will take reasonable steps to give you the notices required by Information Privacy Principle 3A. This may include explaining what was received, its source, why it is needed, who may receive it, and how to request access or correction. Notice may not be required where you already know about the collection, have authorised it, or another lawful exception applies.

4. Why we use information

- To decide whether osteopathic assessment or treatment is appropriate and to provide that care.
- To keep clinical records and monitor progress over time.
- To manage bookings, reminders, cancellations and follow-up communication.
- To lodge and administer ACC claims and process authorised insurance claims.
- To process payments and produce invoices or receipts.
- To communicate with or refer to another healthcare provider where appropriate and authorised.
- To respond to enquiries, access requests, complaints or safety concerns.
- To maintain the practice and comply with legal, regulatory and professional duties.

Health information will not be repurposed for unrelated marketing. General promotional messages will be sent only where permission has been given, and you may opt out of them.

5. When information may be disclosed

CRL Osteopathy does not trade patient information. Information may be disclosed only to the extent reasonably necessary for an authorised or lawful purpose. Possible recipients include:

- ACC or an insurer handling an authorised claim.
- Your GP, specialist, imaging provider or another practitioner involved in your care.
- Cliniko and providers supporting appointments, clinical records, communications, payments, accounting or practice administration.
- A parent, guardian, authorised representative, professional body, regulator, court or government agency where authority or law permits.
- Emergency services or another appropriate person when disclosure is permitted to address a serious threat to health or safety.

6. Systems and providers

Cliniko is used for practice administration, including bookings, patient details, clinical records, reminders and invoicing. Other providers may support website hosting, communications, payments, accounting, ACC administration, insurance claiming or secure storage.

A provider may process information outside New Zealand. Before making a disclosure covered by Information Privacy Principle 12, we will take the steps required by New Zealand privacy law. In some arrangements, an overseas provider may hold or process information as our agent rather than receiving it for its own purposes.

7. Security and privacy incidents

We use safeguards appropriate to the information and the way it is held. These may include password protection, access controls, multi-factor authentication where available, secure connections, device locking, restricted access and secure disposal practices.

No storage or communication method is free from risk. If a privacy incident occurs, we will assess it promptly, take steps to limit harm and make any notifications required by the Privacy Act 2020, including notification to affected people and the Office of the Privacy Commissioner where the legal threshold is met.

8. Record retention and disposal

Clinical records are kept for at least 10 years from the day after the most recent occasion on which CRL Osteopathy provided services to the patient, in accordance with the Health (Retention of Health Information) Regulations 1996.

Other information is kept only while it remains reasonably necessary for its original purpose or for a legal, professional, accounting or operational requirement. When information no longer needs to be retained, it is securely destroyed, deleted or de-identified where appropriate.

9. Access, correction and other choices

You may ask whether CRL Osteopathy holds information about you, request access to it, or ask for inaccurate or incomplete information to be corrected. If a requested correction is not made, you may ask for a statement of correction to be attached to the record.

You may also withdraw permission for future activity that depends on your consent. This will not undo an earlier lawful use or disclosure and, depending on the information involved, may affect the services we can provide.

Requests should be sent to the Privacy Officer. We may need evidence of identity or authority before releasing information. Requests will be handled within the time required by law; access can be withheld only where a lawful ground applies.

10. Babies, children and young people

CRL Osteopathy treats patients of different ages. Information relating to a child or young person may be obtained from them, a parent or guardian, another provider, ACC or another authorised source. Decisions about consent, communication and access to records will take account of the young person's circumstances, understanding, best interests and legal rights. Where appropriate, the young person will be involved in decisions about their information and care.

11. Website and online booking

Our website host and online-booking services may record limited technical information needed for security, reliability and operation, such as an IP address, browser or device type, requested page, and visit date and time. Cookies or similar technologies may also be used to provide website and booking functions or understand general website performance.

Cookie controls are available through most browsers. Blocking essential cookies may prevent parts of the website or booking service from operating correctly. CRL Osteopathy does not knowingly use website analytics to collect clinical notes or the contents of health consultations.

12. Questions, concerns and complaints

Please contact the Privacy Officer first if you want to exercise a privacy right, ask a question or raise a concern. We will consider the matter and respond as promptly as reasonably possible.

Privacy Officer: Casey Liddington
Email: casey@crlosteopathy.co.nz
Phone: 021 113 3977
Location: CRL Osteopathy, inside Snap Fitness Bishopdale, 34 Bishopdale Court, Christchurch

You may also complain to the Office of the Privacy Commissioner:
Website: www.privacy.org.nz
Phone: 0800 803 909

13. Keeping this policy current

This policy may be revised when the practice changes its services, systems or providers, or when legal requirements change. The effective date identifies the version currently in use. Material updates will be made available through the CRL Osteopathy website.

> This policy describes CRL Osteopathy's privacy practices. It is not intended to limit any right or protection available under New Zealand law.