

Credit Card Management Policy and Procedures

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Approved by the General Manager of Life Matters Psychologists on 05/08/21

Version Control

Contact person	Role	Ver No	Date	Review Date
Kimberly Gray	Bookkeeper	1	30 July 2021	30 July 2022

1. About Life Matters Psychologists

Life Matters Psychologists believes in helping people to thrive. Our mission is to provide timely and accessible care of the highest quality to kids, adults and organisations. We offer a range of health and wellbeing services including psychological assessment and counselling, educational and online therapy programs as well as corporate leadership and workplace services. Committed to quality in all that we do, we help people cultivate self-worth, build resilience and grow in mental wellness in order to thrive.

Life Matters Psychologists is committed to delivering best practice ethical standards in all areas of our business.

For the individual we provide the following psychological services:

- psychological assessment and counselling in many clinical areas;
- Cognitive Behaviour Therapy (CBT), Acceptance and Commitment Therapy (ACT), Dialectical Behaviour Therapy (DBT), Mindfulness, Eye Movement Desensitisation Reprocessing and other evidence-based therapies;
- psychological assessment and counselling for workers compensation related rehabilitation;
- Employee Assistance Programs (EAPs);
- Behaviour Assessment and Behaviour Management Plans;
- social and emotional development programs for children;
- online mental health assessments and cognitive assessments; and
- workshops in resilience, well-being, insomnia management, stress management and Building Effective Workplace Relationships.

Conveniently located in Merewether, NSW, we are pleased to advise that we can see clients within five days and more than 95% of clients recommend our practice.

2. Policy and Procedures Purpose

The purpose of this Policy and Procedures is to provide the policies and procedures for Credit Card Management by Life Matters Psychologists staff. It also provides guidelines around the correct permission, access, use and storage of Client credit card information.

This policy and associated set of procedures outlines Life Matters Psychologists' ongoing obligations to all Clients in respect of how we manage their Personal Information and Credit Card details. This Policy and Procedures should be read in conjunction with both the Finance Management Policy and Procedures and the Privacy Policy and Procedures.

3. Scope

This Policy applies to all Life Matters Psychologists employees and Clients.

4. Definitions

Client

A Client is a person receiving goods and/or services from Life Matters Psychologists.

Online Customer

An Online Customer is a person receiving goods and/or services from Life Matters Psychologists website.

Employee

An employee is a person who is hired to provide services in exchange for compensation (pay) (Australian Taxation Office, 2012). An employee is a paid member of staff – this can be on a full-time, part-time, fixed term or casual basis. This includes contractors providing services to Life Matters Psychologists for a set time or specific task and those engaged in the performance of duties for Life Matters Psychologists from a labour hire agency.

5. Aims of the Policy and Procedures

Life Matters Psychologists' Credit Card Management Policy & Procedures ensures that Life Matters Psychologists has an effective, efficient, and lawful approach in collecting, storing, processing, securing, and disposing of a Client's credit card information.

6. Reference

Life Matters Psychologists has adopted the PCI Data Security Standards to protect and govern the way we accept, store, process and transmit credit card transactions.

A copy of the PCI security standards can be obtained from the PCI Security Standards Council website at www.pcisecuritystandards.org.

Life Matters Psychologists as the Merchant (Collector) works with the third party, Pin Payments who is a Level 1 PCI Service Provider. Life Matters Psychologists is guided by and works in adherence with Pin Payment's [Terms of Service](#).

Life Matters Psychologists as the Merchant (Collector) works with the third party, Stripe who is a Level 1 PCI Service Provider. Life Matters Psychologists is guided by and works in adherence with Stripe Australia's [Services Agreement](#).

7. Third Parties

Where reasonable and practicable to do so, we will collect your credit card Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Life Matters Psychologists as the Merchant (Collector) works with two primary third parties in relation to Credit Card Management.

Pin Payments is a Level 1 Service Provider and PCI compliant online credit card storage and transaction system. Pin Payments allows Life Matters Psychologists to process and store Client Credit Card information within our online Client Management System. Pin Payment’s websites and API are forced to use HTTPS to ensure encrypted communications. Pin payment also use [Hosted Fields](#) to allow a website to accept payments without ever handling credit card data.

Stripe is a Level 1 PCI Service Provider and PCI Compliant online payment processing and credit card processing software. Stripe allows safe and efficient processing of funds via credit card and transfers those funds to Life Matters Psychologists registered account. Stripe’s infrastructure for storing, decrypting, and transmitting card numbers runs in a separate hosting environment, and doesn’t share any credentials with Stripe’s primary services (API, website, etc.).

8. Credit Card Authority Policy

Purpose of the Policy

The credit card authority policy governs the way Life Matters Psychologists staff seek, process, store and destroy a client or customer’s credit card information. Credit card authority is only gained when a Credit Card Authority Form is completed and signed by a client or customer.

Procedures

Prior to any of the following credit card procedures being undertaken, the authorising person noted must provide authority to Life Matters. This policy should be considered closely alongside the Financial Management Policy and Procedures and the Privacy Policy and Procedures.

Gaining Credit Card Authority	Client or Customer
Storing Credit Card Information	Client or Customer
Processing a Credit Card	Client or Customer

The following are the steps Life Matters Psychologists’ Staff will take to gain authorisation from a client or customer to store Credit Card information.

- If you are a new Client of Life Matters, you will be asked over the phone if you would like to store your credit card information on your client file for payment of each session to be made on the day before or the day of your session.
- With your verbal consent, we will enter in your credit card name, credit card number, CCV and expiry date into our secure payment system. This is a preliminary authority only.
- Once verbal agreement is given, you will be sent an electronic Credit Card Authority Form. It will ask you to provide your first name, surname, D.O.B and your signature. The form will also outline your nominated service type, our payment terms and cancellation policy.
- The form will request your compliance and authority with the following:
 - Life Matters Psychologists Cancellation Policy
 - Life Matters Psychologists Credit Card Authority Policy

- The form response is saved on your client file which can only be access by authorised Staff.
- Your authority will remain in place until such time as you withdraw consent in writing to keep your details on file.

9. Storage of Credit Card Information

For Clients, Credit card information is encrypted and stored in a completed isolated system. At no time is unencrypted card data stored on disk either at Life Matters Psychologists or inside a third parties management system or in the card storage system. Internally Client card information is referenced only using a token. The token is not derived from card information in any way.

For Online Customers, all card numbers are encrypted at rest with AES-256. Decryption keys are stored on separate machines. None of Stripe’s internal servers and daemons can obtain plaintext card numbers but can request that cards are sent to a service provider on a static allowlist.

When your Credit Card Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to delete or destroy your Credit Card Information. If at any time a client or customer wishes to amend their authority, they can do so in writing to Life Matters Psychologists.

10. Maintaining the Quality of your Personal Information

It is an important to us that your Credit Card and Personal Information is up to date. We will take reasonable steps to make sure that your Credit Card and Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

11. Effectiveness and Review

The General Manager will review this Policy and Procedures document each 36 months on the anniversary of its approval.