# PRIVACY POLICY

Supportive Hands Pty Ltd ABN 97 664 796 982 ("the Company") provides an enabling service to enhance emotional literacy in a home, school, and group settings ("the Service").

We are committed to respecting your privacy. This Privacy Policy sets outs out how we collect, use, store and disclose your personal information (being information or an opinion about an individual which is capable of identifying that individual) in accordance with all applicable laws, regulations, statutes, rules, orders and other requirements of any international, federal, state or local governmental authority ("Privacy Law").

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other agreements between us.

All references to 'us', 'we' or 'our' in this Privacy Policy are references to Supportive Hands Pty Ltd. All references to 'you' or 'your' in this Privacy Policy are references to any individual who accesses or uses the Service or our website, our customers, contractors (or potential customers or contractors), potential employees, and any other individuals we deal with in the course of providing the Service.

We may change our Privacy Policy from time to time by publishing changes to it on our website. You should check our website periodically to ensure that you are aware of our current Privacy Policy.

#### THE TYPES OF PERSONAL INFORMATION WE COLLECT

The types of personal information we collect about you may include:

- your name and contact details (such as your phone number, email address or postal address);
- your age or date of birth;
- your credit card information;
- your occupation, position description and professional background (such as your expertise and qualifications);
- if you use our website, your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- a record of any communications, interactions or agreements we have with you;
- if you are a contractor or supplier (or potential contractor, supplier or employee), any other information which is reasonably necessary to enable us to make an assessment as to whether to do business with or employ you; or
- any other information about you that you provide to us directly or indirectly and by any means.

In addition to the above, and if you provide it to us directly, we may collect some sensitive information about you, such as information about your racial or ethnic origin, political opinion or religious belief, membership of political association or trade union, sexual orientation or criminal record. We will only collect sensitive information about you which is disclosed to us by a third party if we are authorised to do so under Privacy Law.

#### HOW WE COLLECT PERSONAL INFORMATION

Often, your personal information is collected when it is provided by you directly (for example, when you register for or use the Service, access our website, communicate with us, or invest in or enquire about our business).

However, personal information will sometimes be provided to us from third parties (for example, by our service providers, business contacts and network, or recruiters). Where this occurs, we will comply with any obligations we may have under Privacy Law to notify you of our collection of your personal information.

If you provide us with personal information about someone else, you must ensure that you are authorised to disclose that information to us, and that we may collect, use and disclose it for the purposes described in this Privacy Policy. This means that you must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Privacy Policy.

# THE PURPOSES OF OUR COLLECTION, USE OR DISCLOSURE

We collect, hold, use and disclose personal information about you to enable us to provide you with the Service, interact with you about the Service or our business, or engage or employ you (or consider to do so).

For example, we may collect, hold, use and disclose your personal information for the following purposes:

- to verify your identity or your credit card details;
- to enable you to access and use, or enquire about, our website, Service and other software applications;
- to operate, protect, improve and optimise our website, Service and other software applications, business and our users' experience, such as to perform analytics (including email tracking), conduct research or engage in advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and other information related to your use of the Service;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and/or
- to consider your employment application.

#### USING YOUR PERSONAL INFORMATION FOR MARKETING PURPOSES

If we have obtained your consent, we and our carefully selected business partners may also use your personal information to promote and market our services and business to you, including through electronic methods such as email or SMS.

You may opt-out of receiving such direct marketing communications by making a request via our contact details (as set out below), by using the opt-out facilities provided in the marketing

communication (eg an unsubscribe link), or by using any other means for opting-out that we may provide from time to time.

#### WHO WE DISCLOSE YOUR PERSONAL INFORMATION TO

We may disclose your personal information for the purposes described in this privacy policy, or as otherwise authorised or required by law, to:

- our employees and related bodies corporate;
- third party suppliers and service providers (for example, our information technology and administrative providers, and/or our website operators);
- our professional advisers, dealers and agents;
- our payment systems operators (eg merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- any other person or organisation you have authorised us to make disclosures to; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

The disclosures described above may involve your personal information being sent to overseas recipients in some contexts (for example, to any of our service providers who are located overseas. Countries in which such third parties may reside include Australia, New Zealand and United States of America, though this may change from time to time. We will take reasonable steps to ensure that any overseas recipients of your personal information will protect it from loss or unauthorised uses or disclosures.

# USING OUR WEBSITE AND COOKIES

As described elsewhere in this Privacy Policy, we may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under Privacy Law. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy, or as otherwise required by Privacy Law.

#### **SECURITY**

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. We use a number of physical, administrative, personnel and technical measures to protect your personal information in these ways.

However, the internet is not a completely secure environment, and we cannot guarantee the security of your personal information. Where necessary, we will comply with our obligations for data breach reporting under Privacy Law.

Any information you enter into the Service is stored on servers located in Australia. Personal information contained in other sources, for example emails, our client relation management system, and the shareholder database, may be stored through cloud-based systems that are hosted overseas. Such data will remain under our effective control at all times.

#### THIRD PARTY WEBSITES

Our website may contain links to websites operated by third parties. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. Any privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

# ACCESSING, CORRECTING OR ERASING YOUR PERSONAL INFORMATION

If you would like to make a request:

- to access or correct the personal information we hold about you;
- for us to erase personal information we hold about you; or
- for a copy of any personal information which you have provided us;

please contact us using the details provided below. In most circumstances, we will comply with your request. If we deny your request (or part of your request), we will tell you why. We may also need to verify your identity when you make any such request in relation to your personal information.

#### MAKING A COMPLAINT

If you think we have breached a Privacy Law, or you wish to make a complaint about the way we have handled your personal information, please contact us using the details provided below.

Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time.

If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

### **CONTACT US**

For further information about our Privacy Policy or privacy practices, to make a request in relation to your personal information or make a complaint, please contact us using the details set out below:

# **Derek Brown**

Director and Principal Consultant Supportive Hands Pty Ltd

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