

Privacy Policy

This Privacy Policy of **The Child Centred Learning Tree Pty Ltd (ACN 689 373 359) (Us/ us, We/ we, Our/ our)** sets out and governs how we collect, use, store, handle and disclose Personal Information and/or Sensitive Information.

We collect your (and, with parental consent, your child's) Personal Information and Sensitive Information, including but not limited to:

1. Parents and guardians: names, contact and billing details;
2. Children: names, developmental, behavioural and health information;
3. Employees & Managers: employment records;
4. Other stakeholders: engagement and contact records.

We use this information to:

1. Deliver and improve our early childhood observation, school-readiness and behavioural support services;
2. Manage our relationship with you;
3. Market our services; and
4. Comply with our legal and regulatory obligations.

By using or accessing our website at www.thechildcentredlearningtree.com.au, or providing personal information to us, you consent and agree to our collection, use and disclosure of your (and your child's) information as described in this policy. If you do not agree, please do not use our Platform or services.

You may request access to, or correction of, your Personal Information, or lodge a privacy-related complaint. Please see the relevant section below or contact our Privacy Officer.

We may revise or update this Privacy Policy from time to time. Any material changes will be published on the Platform with an effective date, and (where applicable) notified to you directly.

The types of information

The *Privacy Act 1998* (Cth) (**Privacy Act**) defines types of information, including Personal Information and Sensitive Information.

(a) Personal Information

Personal Information means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (i) whether the information or opinion is true or not; and
- (ii) whether the information or opinion is recorded in a material form or not.

If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “Personal Information” and will not be subject to this privacy policy.

(b) Sensitive Information

Sensitive Information is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive Information will be used by Us only:

- (i) for the primary purpose for which it was obtained;
- (ii) for a secondary purpose that is directly related to the primary purpose; and
- (iii) with your explicit consent or where its collection, use or disclosure is required or authorised by law.

The types of Personal information and Sensitive Information we collect and hold

The types of Personal Information we may collect and hold includes (but is not limited to) Personal Information about:

- your name, address, contact telephone number and other contact details such as your email address;
- your child’s name, gender, date and place of birth, age, care requirements, address, custody arrangements or parenting orders, languages spoken, photographs and videos of child, sample of child’s work, and general information about the child and family;
- payment information (such as credit/ debit card or bank details);
- other Personal Information required to provide our services in specific cases; and
- details of your use of our products or services.

The types of Sensitive Information we may collect and hold includes (but is not limited to) Sensitive Information about:

- your child’s health and medical information, including but not limited to health and wellbeing information, Medicare number, medical diagnoses, dietary requirements, languages spoken, doctor’s details, medical conditions, immunisation status, additional needs, etc.

You are not obliged to provide Personal Information or Sensitive Information to us. However, in many cases, if you do not provide us with the necessary information, we may not be able to supply the relevant functionality of the Platform or our services effectively.

In some circumstances, you may provide to us, and we may collect from you, Personal or Sensitive Information about a third party. Where you provide the information of a third party, you must ensure that the third party is aware of this Privacy Policy, understands it and agrees to accept it. If you are providing us with Personal Information or Sensitive Information on behalf of a person who is under the age of 18 (a Child) that you are the parent or guardian of, you understand that you are providing your explicit consent to this Privacy Policy and to our collection, use and disclosure of the Child's Personal and Sensitive Information on their behalf as their legal guardian.

To provide our behavioural observation and planning services for early childhood development, we may need to collect Sensitive Information about a Child. This can include, but is not limited to, health information, developmental observations, and information related to their emotional and social readiness. We will only collect Sensitive Information about a Child with your explicit consent as their parent or legal guardian. By agreeing to this Privacy Policy and engaging our services for a Child, you provide your consent for us to collect such Sensitive Information. We will only collect Sensitive Information from you if you agree to provide it to us, you authorise us to obtain it from a third party, or where the collection of the information is required or authorised by or under an Australian law or a court/tribunal order, or otherwise where the collection is not prohibited under Australian law.

How Personal Information and Sensitive Information is collected and held by us

We collect Personal Information and Sensitive Information in the following ways:

- when you fill in and return to us a signed client form;
- when you submit Personal Information and Sensitive Information through the Platform (such as when you send us a message or fill out an online form);
- in person, for example, when you engage with our employees, agents, or customer service representatives;
- in the course of providing services to you;
- when we collect behavioural observations and information during scheduled sessions with children, with the explicit consent of their parents or legal guardians.

While we limit the collection of Sensitive Information to what is necessary for our services, we do collect Sensitive Information as outlined above, particularly concerning children's health and developmental observations. When we collect Sensitive Information, we will always comply strictly with the Privacy Act and obtain your explicit consent unless otherwise permitted or required by law.

Collection of Personal Information and Sensitive Information through activity

- Information that may identify you as a user may be gathered during your access to the Platform.
- The Platform may include pages that use 'cookies' and similar tracking technologies. A cookie is a unique identification number that improves user experience, analyses website traffic, and delivers personalised content or advertisements and allows the server to identify and interact more effectively with your computer or device. The cookie assists us in identifying what our users find interesting on the Platform.
- A cookie may be allocated each time you use the Platform. The cookie does not identify you as an individual in our data collection process; however, it does identify your Internet Service Provider.
- You can configure your access to the Platform to refuse cookies. If you do so, you may not be able to use all or part of the Platform.

How we hold Personal Information and Sensitive Information

We store Personal Information and Sensitive Information in a way that reasonably protects it from unauthorised access, misuse, modification or disclosure. We take steps to protect your information against loss, unauthorised access, use, modification or disclosure. Some examples of the steps we take to protect your Personal Information and Sensitive Information include:

- ensuring there are suitable password protection measures and access privileges in place to monitor and control access to our IT systems;
- imposing restrictions on physical access to paper files (if any);
- requiring any third parties engaged by us to provide appropriate assurances to handle your information in a manner consistent with Australian law; and
- taking reasonable steps to destroy or de-identify Personal Information or Sensitive Information after we no longer need it for our business or to comply with the law.

The Australian Privacy Principles (**APP**):

- permit you to obtain access to the Personal Information or Sensitive Information We hold about you in certain circumstances (**APP 12**); and
- allow you to correct inaccurate Personal Information or Sensitive Information subject to certain exceptions (**APP 13**).

Where you would like to obtain such access, please contact Us in writing on the contact details set out at the bottom of this Privacy Policy.

The purposes for which we collect, hold, use and disclose Personal Information and Sensitive information

We collect, hold, use and disclose Personal Information and Sensitive Information for a variety of business purposes, including:

- to provide the products or services you have requested from us, specifically our behavioural observation and planning support services for early childhood development;
- to conduct regular scheduled sessions for observing children and collecting relevant developmental and behavioural information;
- to design a comprehensive management plan for a child's behaviour, academic, emotional, and social readiness based on our observations and collected information;
- to facilitate appropriate referrals for further professional or medical advice if necessary (it is important to note that we **do not** provide diagnostic or therapeutic services);
- to improve our business, products, and services;
- to promote our business to you;
- to market our other services or products to you;
- to handle and respond to your enquiries, complaints, or concerns; and
- to provide **Personal Information and Sensitive Information** to third parties as set out in this Privacy Policy, only where necessary and with appropriate safeguards and your consent where required by law.

Direct marketing

We also collect, hold, use and disclose your Personal Information to:

- notify you about the details of new services and products offered by us;
- send you our newsletters and other marketing publications;
- administer our databases for client service, marketing and financial accounting purposes; and
- to comply with our legal requirements regarding the collection and retention of information concerning the products and services that we provide.

If you do not wish to disclose your Personal Information for the purpose of direct marketing or you would like to opt-out of receiving direct marketing communications, you can do so by contacting us using the contact details set out below, or by following the instructions to unsubscribe which are contained in a communication that you receive from us.

We may use your Personal Information (but never any Sensitive Information) to contact you about our services, updates, and promotions.

Third Party Service Providers

We may disclose your Personal Information and where necessary, Sensitive Information to third parties who work with us in our business to promote, market or improve the services that we provide, including:

- providers of customer relations management database services and marketing database services;
- marketing consultants, promotion companies and website hosts;
- partnered businesses;
- linked services providers; and
- consultants, medical professionals and professional advisers.

We use third-party payment service providers to process transactions securely. These providers may collect and store your payment details in accordance with their own privacy policies.

We may also combine your Personal Information with information available from other sources, including the entities mentioned above, to help us provide better services to you.

Where we do share information with third parties, we require that there are contracts in place that only allow use and disclosure of Personal Information and Sensitive Information to provide the service and that protect your Personal Information or Sensitive Information in accordance with Australian law. Otherwise, we will disclose Personal Information (and Sensitive Information only with explicit consent) to others if you have given us permission, or if the disclosure relates to the main purpose for which we collected the information and you would reasonably expect us to do so.

How we handle requests to access your Personal Information and Sensitive Information

You have a right to request access to your Personal Information and Sensitive Information which we hold about you and to request its correction. You can make such a request by contacting us using the contact details set out in this policy.

We will respond to any such request for access as soon as reasonably practicable. Where access is to be given, we will provide you with a copy or details of your Personal Information and Sensitive Information in the manner requested by you where it is reasonable and practicable to do so.

We will not charge you a fee for making a request to access your Personal Information or Sensitive Information. However, we may charge you a reasonable fee for giving you access to your information.

In some cases, we may refuse to give you access to the information you have requested or only give you access to certain information. If we do this, we will provide you with a written statement setting out our reasons for refusal, except where it would be unreasonable to do so.

How we handle requests to correct your Personal Information and Sensitive Information

We will take such steps (if any) as are reasonable in the circumstances to make sure that the information we collect, use or disclose is accurate, complete, up to date and relevant.

If you believe the information we hold about you is inaccurate, irrelevant, out of date or incomplete, you can ask us to update or correct it. To do so, please contact us using the contact details listed below.

How to contact us or make a complaint

If you have any questions about this Privacy Policy, if you wish to correct or update information we hold about you or if you wish to request access or correction of your Personal information or make a complaint about a breach by us of our privacy obligations (including the way we have collected, disclosed or used your Personal information and Sensitive Information), please contact:

Attention: Privacy Officer

Email:

belinda@thechildcentredlearningtree.com.au

Number

0484003664

Address: PO Box 1349 Bundoora 3083

We will acknowledge and investigate any complaint about the way we manage Personal or Sensitive Information as soon as practicable. We may seek further information from you to clarify your concerns. If We agree that your complaint is well founded, We will, in consultation with you, take appropriate steps to rectify the problem. We will take reasonable steps to remedy any failure to comply with our privacy obligations.

If you are not satisfied with our response, you may lodge a complaint with the **Office of the Australian Information Commissioner (OAIC)** at:

Website: www.oaic.gov.au

Phone: 1300 363 992