

## PRIVACY POLICY

### To whom are you disclosing your personal information?

Beyond Distinction is a business of Bright Sparks Learning & Development Pty Limited ABN 28 614 989 632. When you are disclosing your personal information to Beyond Distinction you are disclosing this information to Bright Sparks Learning & Development Pty Limited. Our primary purpose is to provide a variety of professionally instructed sports, music and extra-curricular activities to primary school aged students, in a safe, friendly and supportive environment. It is in the process of providing these services that we collect and manage personal information.

### What is the purpose of this policy?

This privacy policy outlines how we manage personal information including how we collect, use, disclose and store personal information. Because we deal with a range of stakeholders, we have created specific privacy collection notices for stakeholders we regularly collect personal information from – namely, students, parents and carers, job applicants and contractors. These notices can be found at the end of this privacy policy and form part of this privacy policy. These notices provide more details on our privacy practices relevant to these stakeholders. Therefore, please ensure you read the relevant notice carefully. We will also provide you with a copy of the relevant notice (in hard copy version or by way of an electronic link) at the time we collect your personal information or as soon as practicable thereafter.

By providing your personal information to us, you are consenting to our management of your personal information in accordance with this privacy policy. There may be times we need to change this privacy policy, for instance, in recognition of the dynamic environment of the internet or a change in law. Any updated versions will be published on our website and we encourage you to check our website regularly to ensure you are kept abreast of this privacy policy. At all times, we respect your privacy and are committed to protecting it.

There are some common terms used throughout this policy which we've provided their definition below for your reference:

<b>Personal Information</b>	means information or an opinion about an individual that is reasonably identifiable. This may include, for instance, your name, age, gender, contact details as well as financial and health information.
<b>we, us, our</b>	Bright Sparks Learning & Development Pty Limited ABN 28 614 989 632

### What is the scope of this policy?

This policy does not apply to our management of employee records which is exempt from the Privacy Act 1988 (Cth). However, we treat information collected about our employees with the same standard of respect and commitment as we treat confidential information.

### Why do we collect, hold, use and disclose personal information?

Generally, we collect, hold, use and disclose personal information so that we can provide our services. The specific purpose for which we collect and hold personal information will depend on the nature of relationship you have with us and is explained in the relevant privacy collection notice.

Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.

### **What personal information do we collect?**

Generally, we collect the following kinds of personal information:

- name;
- mailing or street address;
- email address;
- telephone and other contact details; and
- age or date of birth.

We may also collect further personal information (which can include sensitive and health information) depending on your relationship with us.

For instance:

- for students, we collect students' medical and health details as well as family details, relevant court orders, parent/carer and emergency contact information as well as details about student welfare and wellbeing.
- for job applicants, we may collect health information in the course of any pre-employment medical examination or any aptitude or psychological testing.

We may also collect Medicare numbers to be used and disclosed where we reasonably believe it necessary to lessen or prevent a serious threat to the life, health or safety of any student (or to public health or safety) and it is unreasonable or impracticable to obtain consent. We may also collect government identifiers (e.g. drivers license numbers) where reasonably necessary to verify the identification of an individual. In all circumstances, we collect, use and/or disclose government identifiers in accordance with the law.

### **How do we collect personal information? From whom is it collected?**

We usually collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in the following ways:

- through your registration, access and/or use of our website, app and other online presence;
- during your communication with us through correspondence or email;
- during interaction with your use of our services;
- through your participation in our surveys; and/or
- during conversations between you and our representatives.

We may also collect your personal information from third parties. If you are a job applicant, we may collect personal information from a recruitment agency, your prior employers and others who may be able to assist us in our decision on whether to offer you employment. Where we collect personal information from a third party, we will take reasonable steps to either notify or ensure you are aware that we have collected your personal information and the circumstances of the collection.

At all times, our collection of personal information is lawful and fair.

Sometimes we receive unsolicited personal information. It is our general practice that unsolicited personal information is destroyed or de-identified unless it is unlawful to do so.

### **To whom do we disclose your personal information?**

In providing our services, we may disclose your personal information to:

- our employees;
- contractors, consultants and professional advisers, third party suppliers, service providers, dealers and agents (including website and information technology and payment providers);
- payment systems operators (for instance, merchants receiving card payments);
- our existing or potential business partners;

- specific third parties authorised by you to receive information held by us; and/or
- other persons, including, without limitation, government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

### **Do we disclose, transfer or store your personal information outside Australia?**

We do not disclose, transfer or store personal information outside Australia. However, we use third party payment providers such as EziDebit, BPAY and/or Paypal etc to facilitate payments and to this end, they may disclose your personal information to entities outside of Australia. The privacy laws in these countries may not provide the same level of protection as the Australian privacy laws. When you provide your personal information to us, you consent to the disclosure, transfer and storage of your personal information outside of Australia and acknowledge that we are not required to ensure that overseas recipients manage that personal information in compliance with Australian privacy laws.

### **How do we hold and secure your personal information?**

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure. Further, we use a number of physical, administrative, personnel and technical measures to protect your personal information. For example, we conduct regular IT audits and monitor internal staff access to personal information. However, we cannot guarantee the security of your personal information.

Further, we take reasonable steps to destroy or de-identify any personal information that is no longer needed unless otherwise required by law.

As our website is linked to the internet and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

### **Does our website collect personal information? Does our website use cookies?**

When you access and use our website, we may collect personal information about you.

Generally, we do not use browsing information to identify you personally however we may record certain information about your use of our website, such as:

- which pages you visited;
- the time and date of your visit; and
- IP (Internet Protocol) address assigned to your computer.

We may also collect your personal information by using cookies or other similar tracking technologies. A cookie is a small summary file containing a unique ID number. When you access our website, we may send your computer a cookie which will help us to service you better, for instance, by automatically populating registration details. It also helps us monitor the products and/or services you view so that, if you agree, we can send you news about those products and services. You can disable cookies through your browser but this may impact your experience on our website.

Information may also be used to analyse trends, track user movements, and gather demographic information so that we can improve our products and services as well as our online presence.

All personal information collected by cookies is handled in the same we manage other personal information as described in this privacy policy.

### **What about third party links from our website?**

Our website may contain links to other websites operated by third parties. These links are provided for your convenience. We do not have any control or rights over those websites so make no

representations or warranties with respect to the contact and/or privacy practices of those websites. We encourage you to read their privacy policies (which may be substantially different to ours) prior to using their websites.

### **What situations can you deal with us anonymously or by using a pseudonym?**

There are limited circumstances where you can deal with us anonymously or by pseudonym. Some of these circumstances include in an emergency, providing us feedback on our services, making a whistleblower alert, or where required by law.

### **How do you access or correct your personal information?**

If you require access to any personal information we hold about you, please contact our Director (details below). We will consider your request and if appropriate, we will discuss with you a suitable way to give you access (for instance, by mailing, emailing it to you or inviting you to our offices to review the information to be accompanied by one of our representatives). A fee may apply to cover our administrative and other reasonable costs in providing you access. If we do need to apply a fee, we will let you know beforehand. We will not charge you for simply making a request to access or correct your personal information.

Unfortunately, there may be times where we are not in a position to provide you access with all or some of your personal information. For instance, if giving you access will result in a breach of confidentiality or privacy of another person. We will give you written reasons if we are not in a position to provide you with access.

If you believe any personal information we hold about you is incorrect or incomplete, please contact our Director (details below). We will respond to a request for correction within 30 days. If we believe we cannot comply with your request to amend your personal information, we will provide you with written reasons.

In both instances of requesting access and/or correcting your personal information, we will need to verify your identity.

We also take reasonable steps to correct your personal information where we believe the information is not correct or updated. From time to time, we will ask you to verify that your personal information held with us is updated.

### **How do you make a complaint about a breach of privacy?**

We treat all complaints confidentially.

If you wish to make a complaint about the manner in which we have managed your personal information, please contact our Director (details below). So that we can fully consider your complaint, please provide us with:

- your name;
- your relationship with us, for instance, whether you are a client, job applicant or otherwise
- your contact details;
- the nature of your complaint; and
- a description of the incident which has occurred leading to your complaint.

On receipt of your complaint, we will send you a formal acknowledgement of your complaint. Within 30 days of receipt of your complaint, our representative will contact you to discuss your concerns and outline options on how your complaint may be resolved. Our objective is to resolve your complaint in a timely and appropriate manner.

If you are unhappy with our options, you may also contact the Office of Australian Information Commissioner (**OAIC**). For more details, please visit [www.oaic.gov.au](http://www.oaic.gov.au) or call the OAIC on 1300 336 002.

## Contact Us

For further information about this privacy policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below. We also welcome any feedback you may have on this privacy policy.

Ms Joyce Lee, Director

Email: [joyce@beyond-distinction.com.au](mailto:joyce@beyond-distinction.com.au)

Phone: (02) 8091 2886 or 04575 88812

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### Version History

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