

# Privacy Policy

---

## 1. Overview

- 1.1 **BEELIEVE PAEDIATRIC THERAPY PTY LTD ACN 666 492 351** (referred to as "we" and "our" and "us") understands and respects your desire to maintain your privacy. It is our priority to maintain your privacy in all of your dealings with us.
- 1.2 We may in the course of providing our services to you be required to collect your personal information.
- 1.3 This Privacy Policy is intended to explain how we and our related entities will collect your personal information and protect your privacy.
- 1.4 We will always act in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**APPs**) when dealing with your personal information.

## 2. What information is covered under this policy?

- 2.1 This Privacy Policy covers your personal information. Personal information is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable. All personal information received in connection with our business is subject to strict rules of confidentiality.
- 2.2 Common examples include your name, signature, address, telephone number, email, date of birth, bank account details, billing and credit card details, photos of you and commentary or opinion about you.

## 3. Personal information that we may collect from you

- 3.1 We may collect some or all of the following types of personal information:
  - (a) information that you give us through your dealings with us;
  - (b) information that we may collect from you; and
  - (c) information that we may receive from you from other third-party sources.
- 3.2 By agreeing to this Privacy Policy, you consent to the fact that you are aware that we are collecting your personal information and disclosing it as required by us and in accordance with the *Privacy Act 1988* (Cth) and any applicable Australian Privacy Principles.

## 4. How personal information is collected

- 4.1 "Personal information" is data that identifies, relates to, describes, can be used to contact, or could reasonably be linked directly or indirectly to you. For the purposes of this Privacy Policy, there is no meaningful distinction between the terms "personal information" and "personal data".
- 4.2 You may choose not to provide some of the personal information described above. Please note, however, that some of our services require some personal information to operate, so if you choose not to provide the personal information necessary to operate and provide you with a particular service or feature of that service, you may not be able to use that service or feature.

### Information that you give us

- 4.3 We may collect your personal information directly from our contact with you. This may include by you completing forms or parts of our website, applications and/or software, or by you contacting us via email, telephone, through social media and other similar functions either directly through our website or through third-party host websites, in person, through various marketing channels

or competitions either directly through our website or through third-party host websites, and surveys.

- 4.4 You understand that any personal information that you provide to us must be accurate and up to date. We will assume this to be the case.

#### Information that we collect about you

- 4.5 In this Privacy Policy "Social Media" means social media networking sites of any kind or nature including but not limited to web or internet based or mobile telephonic devices or medium such as *facebook, twitter, Instagram* and *LinkedIn* which enable the creation and exchange of user generated content.
- 4.6 Our website, Social Media, software and/or mobile applications may automatically collect the following information about you each time you visit our website, Social Media, software and/or mobile applications:
- (a) technical information including but not limited to the Internet Protocol Address used to connect your computer to the internet, the internet browser and version that you are using when accessing our website, Social Media, software and/or mobile applications, any additional plug-ins that you are using, and your computer's operating system and platform; and
  - (b) information about the time and date you accessed our site and Social Media, and what you accessed on our site and Social Media. This includes links that you clicked on, what content you accessed, how long you accessed that content for, whether you downloaded any content, whether supplied by us or downloaded from a third-party host, and how you navigated to and from our website, Social Media, software and/or mobile applications to other sites or other pages hosted by us.

#### Sensitive information

- 4.7 Throughout the course of collecting your personal information, we may (but generally will not) collect sensitive information about you. Sensitive information includes:
- (a) information or an opinion about your racial or ethnic origin; or political opinions; or membership of a political association; or religious beliefs or affiliations; or philosophical beliefs; or membership of a professional or trade association; or membership of a trade union; or sexual orientation or practices; or criminal record that is also personal information; or
  - (b) health information about an individual; or genetic information about an individual that is not otherwise health information; or biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or biometric template.
- 4.8 If we do collect any of your sensitive information, we will only collect it in accordance with Principle 3.3 of the Australian Privacy Principles. This means that we will only collect this information with your consent and for reasons that are reasonably necessary or otherwise related to the provision of our services.
- 4.9 Where you consent to our collection of your sensitive information, you also consent to us using that sensitive information for the purpose/s for which it was collected, including its disclosure to third parties.

### **5. How we use your personal information**

- 5.1 You consent to the disclosure of your personal information to any of our related entities.
- 5.2 You consent to our collection of your personal information and disclosing it to third parties where necessary and for the purposes for which it was collected.

5.3 This may include:

- (a) using your personal information to provide you with services that you have engaged us to provide;
- (b) using your personal information to provide you with information that you have requested from us;
- (c) authenticating your credit or debit card account information;
- (d) using your personal information for marketing purposes to provide or offer services to you. This includes, but is not limited to, keeping you up to date with our latest news, events, special offers and promotion of our brand or other similar products that we think that you may be interested in. This includes both our direct marketing to you or another third party whom you have authorised us to disclose your personal information to;
- (e) to notify you about any changes to our products, website, software and/or mobile applications, brand or services offered;
- (f) to seek your opinion and feedback on any of our services, including for the purposes of product improvement and customisation, website/software improvement and personalisation and other general services;
- (g) for consumer engagement and/or customer service purposes, including but not limited to identifying the effectiveness of advertising, allowing you to participate on website viral features such as sharing website content and other community features (for example, blogs);
- (h) for other general services such as website/software security, maintenance, identification of fraud or errors, internal accounting and administration, and for any other purpose that we are required or permitted to do by law; and
- (i) to manage our relationships with you and our other customers.

**6. Legal obligations to disclose**

6.1 We may be required to disclose your personal information for the purposes for which it was collected and also subject to our legal obligations:

- (a) as required by law;
- (b) to any person where necessary or desirable in connection with our provision of services; and
- (c) on a confidential basis to our external service providers and advisors.

6.2 To be clear, you consent to our disclosure of your personal information to any of our business partners, suppliers, sub-contractors or the like, advertisers and other advertising networks, analytics and search engine providers and other third-parties provided the disclosure of your personal information is for the purpose or ancillary to the services that we or these third-parties offer you and for the purposes the information was originally collected.

6.3 We may share your information with other third-party business partners for their own marketing purposes. These third-parties include online advertisers or ad tech companies, who may provide you with targeted advertising and marketing communications, where permitted under law. The information we share includes information collected through your use of our services and information we collect about you through the use of cookies and similar technologies.

- 6.4 You understand that we are authorised to disclose your personal information to third-parties if we buy or sell any business or assets, including our business, if we are under a duty to disclose your information, or if the disclosure of your personal information is necessary for us to conduct an investigation into any unlawful activity that we know or suspect has or may be engaged in.
- 6.5 You consent to the disclosure of your personal information to overseas recipients, and warrant that you are aware that an overseas recipient of your personal information is not required to comply with the *Privacy Act 1988* (Cth) or the Australian Privacy Principles. Please notify us immediately if you have any objections to us providing your personal information to any overseas recipient.
- 6.6 You consent to the disclosure of all information necessary for our company to comply with any relevant reporting obligations (if any) pursuant to the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).
- 6.7 We will take all reasonable steps to ensure that any overseas recipient of your personal information does not willingly or knowingly breach the Australian Privacy Policy in relation to your personal information.

## **7. How we store your personal information**

- 7.1 We maintain commercially-reasonable technical, administrative, and physical security measures designed to protect your information from loss, misuse, unauthorised access, disclosure, alteration, and destruction.
- 7.2 When your credit or debit card account information is being transmitted to our services or through our services, it will be protected by cryptographic protocols. To be clear, we do not ourselves store your credit or debit card account information, and we do not have direct control over or responsibility for your credit or debit card account information. We use third party payment processors that are the controllers of your credit card information. Our contracts with third parties that receive your credit or debit card account information require them to keep it secure and confidential.
- 7.3 However, we cannot guarantee that transmissions of your credit or debit card account information or your other information will always be secure or that unauthorised third parties will never be able to defeat the security measures taken by us or our third-party service providers. Except to the extent that liability cannot be excluded or limited due to applicable law, we assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorised third-party access, or other causes beyond our control.
- 7.4 We will only keep your information for as long as reasonably necessary to fulfil the purposes for which your personal information was originally collected.
- 7.5 We will delete your information after a reasonable time. You may be required to re-enter your personal information if it has been deleted.
- 7.6 You agree and acknowledge that your personal information may be stored at or transferred within Australia or a destination outside of Australia. This will allow staff operating outside of Australia (whether employed by us or by a third-party engaged by us or otherwise authorised under this Privacy Policy to access your personal information) to process your information for the purposes of providing you with our services.
- 7.7 We will take all reasonable steps and precautions to ensure that any transmission of your personal information via the internet is secure. However, we cannot guarantee the security of any data transmitted to our website and you agree and acknowledge that any such transmissions are at your own risk.
- 7.8 Once we receive your information, we take reasonable steps to protect your personal information. This may include storing any information on a secure server and employing strict procedures and security features to protect your personal information from any unauthorised recipients and to

prevent unauthorised access to the same. We may also store your personal information in physical form.

7.9 All our employees with access to your information will be held to the confidentiality obligations as set out in this Privacy Policy.

## **8. Collections of your information using cookies and other tracking technologies**

8.1 Our website and/or mobile applications use "cookies". Cookies are small pieces of data sent from a website and stored in your web browser. These pieces of data will allow our website and/or mobile applications to remember who you are and to obtain information from you which allows us to deliver you a better and more customised service. As a result of our website and/or mobile applications' use of cookies, we may collect information such as your IP address, online activity and your web browser details. Information that we will not collect or store includes your passwords or other sensitive information.

8.2 If you enabled cookies when accessing our website and/or mobile applications, we will take this as consent to our use of cookies and other technologies mentioned in our Privacy Policy.

8.3 Please note that you should also refer to our website's Terms of Use for further information on this issue.

## **9. Your rights**

9.1 You have the right to request access to the personal information we hold about you by contacting us or our Privacy Officer by emailing us or in writing to us at our address on our Contact Page.

9.2 If we cannot provide you with access, we will write to you and provide you with the reasons why we are unable to provide you with access.

9.3 If any personal information that we hold about you is inaccurate, incomplete or not up to date, you may write to us or our Privacy Officer and request that we correct the information at the above address.

9.4 You have the right to request that we do not disclose your personal information (for example, for marketing purposes). You can exercise your rights by unchecking the relevant check boxes on our website and/or mobile applications when you provide us with your personal information, or by writing to us at the above address.

9.5 You may choose to opt out of receiving any further correspondence from us by writing to us at the above address or emailing us at the above email address.

## **10. Complaints**

10.1 If you are concerned about a possible interference with your privacy or about the potential misuse of your personal information, please contact us at the above email address.

10.2 We take all complaints very seriously. It is our policy to handle complaints in a timely, effective, fair and consistent manner. If you are not satisfied with our response, you have the right to refer your complaint to the Office of the Australian Information Commissioner.

## **11. Privacy Policy updates**

11.1 This Privacy Policy was last updated in November 2023.

11.2 We reserve the right to make changes to this Privacy Policy at any time. We encourage you to regularly review this Privacy Policy to make sure you are aware of any changes and how your information may be used.