

# **Privacy Policy**

### **Our Commitment**

Liberate Learning Pty Ltd (Liberate) (ABN 93 611 619 017) is committed to protecting the privacy of individuals and all personal information held by Liberate is managed in accordance with the Australia Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act). We understand the importance of, and are committed to, protecting your personal information.

This Privacy Policy explains how we manage your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable), including our obligations and your rights in respect of our dealings with your personal information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au.

# What is Personal Information & why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website www.liberatelearning.com.au, from your website, from media and publications, from other publicly available sources, from cookie and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/ marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

#### Sensitive Information

Sensitive information is defined in the Privacy Act to include 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:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent
- Where required or authorised by law.

#### How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

 When you make an inquiry or order in relation to goods or services through our website located at liberatelearning.com.au

Liberate Learning Pty Ltd Level 5, 171 Collins St Melbourne, VIC 3000 enquiries@liberatelearning.com.au Phone: 1300 448 060 ABN 93 611 619 017



- In administering and performing any contracts with service providers
- When you contact us via telephone or facsimile
- From correspondence (whether in writing or electronically)
- Through any mobile applications provided by our organisation
- While conducting customer satisfaction and market research surveys
- When administering any of our services
- As otherwise required to manage our business.

However, in certain cases we may collect personal information from publicly available sources and third parties, such as suppliers, recruitment agencies, contractors, our clients, and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

### Types of personal information we collect

The type of personal information we may collect can include (but is not limited to), your name, postal address, email address, phone numbers, and billing information.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services.

# Our purposes for handling your personal information

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use, and disclose personal information to:

- Offer and provide you with our goods and services
- Manage and administer those goods and services, including account keeping procedures
- Communicate with you, including (but not limited to), emailing you tax invoices, dispatch, and tracking information, returns and exchange authorisations
- Comply with our legal and regulatory obligations.

We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

We may disclose personal information between our organisations or to third parties such as our suppliers, organisations that provide us with technical and support services, or our professional advisors, where permitted by the Privacy Act. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

### **Protection of personal information**

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas.

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We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information do their job. Physical, electronic, and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

#### **Direct marketing**

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to customers at a high standard. We therefore like to stay in touch with customers and let them know about new opportunities. We may provide you with information about new products, services, and promotions either from us, or from third parties which may be of interest to you.

We will not disclose your personal information to third parties for marketing purposes without your consent.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

#### Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are

Liberate Learning Pty Ltd Level 5, 171 Collins St Melbourne, VIC 3000 enquiries@liberatelearning.com.au Phone: 1300 448 060 ABN 93 611 619 017 experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

#### Accessing and correcting your personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if it does not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

#### **Third Parties**

Where reasonable and practicable to do so, we will collect your Personal 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.

#### **Disclosure of Personal Information**

Your Personal Information may be disclosed in a number of circumstances including the following:



- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

#### **Security of Personal Information**

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

#### **Accessing your Personal Information**

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Liberate will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

# Maintaining the Quality of your Personal Information

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-todate. 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.

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#### **Policy Updates**

This Policy may change from time to time and is available on our website.



## **Privacy Policy Complaints and Enquiries**

If you have any queries or complaints about our Privacy Policy, please contact us at:

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