

## PRIVACY POLICY

### 1. ABOUT THIS POLICY

- 1.1 This Privacy Policy (**Policy**) applies to Little Star Kids Pty Ltd ABN 48 602 704 781 ("LSK", "**we**", "our" or "**us**"), and describes how LSK collects, handles and protects the privacy of your personal information.
- 1.2 ***We work to improve the lives of children living in foster care through programs such as our Cuddle Case Program, our Camps Program and our Little Stars Learners Program.***
- 1.3 **We** are committed to protecting your privacy and understand the importance of protecting your personal information. This Policy outlines the types of personal information that we usually collect, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure and your rights in relation to your personal information, including how to complain and how we deal with complaints.
- 1.4 We will handle your personal information in accordance with this Policy, legislation including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) and the Child Protection Act (Qld).
- 1.5 In this Policy, **personal information** means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not. It does not include information that is de-identified.
- 1.6 This Policy does not apply to the personal information of our employees.
- 1.7 We may change this Privacy Policy from time to time, by publishing changes on our website.

### 2. TYPES OF PERSONAL INFORMATION WE COLLECT

- 2.1 The types of personal information we collect about you depends on the dealings you have with us, and may include:
- (a) name, address, email address and phone number.
  - (b) the name of the organisation you work for and your professional title; and
  - (c) your interests and preferences.
  - (d) Information relevant to the education and well-being of children who participate in our programs including school reports and reports from other psychological or health professionals.
- 2.2 If you are applying for a job with us, we may also collect your:
- (a) employment history and qualifications;
  - (b) academic records;
  - (c) references;
  - (d) medical information;
  - (e) personal alternative contact details;
  - (f) superannuation fund details; and
  - (g) criminal history record.

### **3. DEALING WITH US ANONYMOUSLY OR USING A PSEUDONYM**

- 3.1 Where possible and lawful, you may interact with us anonymously or using a pseudonym. For example, if you contact us with a general question, we will not record your name unless we need it to adequately handle your question.
- 3.2 However, for many of our functions and activities we usually need your name, contact information and other details to enable us to provide our services or products to you.

### **4. WAYS WE COLLECT YOUR PERSONAL INFORMATION**

- 4.1 We may collect personal information from or about you in different ways, including:
- (a) from you directly when you interact with us, eg from our discussions with you, when you complete a form, your emails and your interaction with our website;
  - (b) through third parties with whom we interact in order to provide our services; and
  - (c) publicly available sources, including social media.
- 4.2 If you apply for a job or contract position with us, we may also collect personal information about you from third parties and publicly available sources, including:
- (a) recruiters;
  - (b) government departments to verify your entitlement to work in Australia;
  - (c) police agencies to obtain your criminal history record;
  - (d) academic institutions;
  - (e) consulting medical practitioner;
  - (f) superannuation fund provider;
  - (g) your current or previous employers; or
  - (h) your referees.

### **5. COLLECTION OF INFORMATION VIA OUR WEBSITE**

- 5.1 When you visit our website, we may also use 'cookies' or other similar tracking technologies that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, 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 website may not work as intended for you if you do so.
- 5.2 Whilst 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, search engine referrals and the internet protocol address assigned to your computer.
- 5.3 Our web pages may contain electronic images, known as web beacons. These electronic images enable us to count users who have visited certain pages on our website. Web beacons are not used by us to access your personal information, they are simply a tool we use to analyse which web pages are viewed, in an aggregate number.

### **6. PURPOSES FOR WHICH WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION**

- 6.1 We collect your personal information for the following purposes:

- (a) to provide our services;
- (b) to manage and conduct our business;
- (c) to offer or promote our products and services.
- (d) to obtain feedback;
- (e) to help us manage, develop and enhance our services, including our websites and applications.
- (f) to consider your suitability for employment; and
- (g) to comply with our legal obligations, resolve any disputes and enforce our agreements and rights with third parties.

## **7. DISCLOSING YOUR PERSONAL INFORMATION**

7.1 In the course of providing our products and services to you, we may disclose your personal information with the following:

- (a) members of the LSK's Group of companies;
- (b) third parties in order to provide our services, for example to tutoring companies to assist with provision of tutoring services;
- (c) organisations we contract to provide services on our behalf such as software suppliers and mail houses;
- (d) anyone to whom part of all of our assets or businesses are transferred or sold;
- (e) our professional advisers, including lawyers, accountants, and auditors; and
- (f) government agencies, regulatory bodies and law enforcement agencies, or other similar entities.

## **8. DIRECT MARKETING**

8.1 We may use your personal information to identify a product or service that you may be interested in or to contact you about an event or promotion. We may, with your consent, use the personal information we have collected about you to contact you from time to time whether by phone, email or sms, to tell you about new products or services and special offers that we believe may be of interest to you.

8.2 You can withdraw your consent to receiving direct marketing communications from us at any time by unsubscribing from the mailing list by emailing us at [info@littlestarskids.org.au](mailto:info@littlestarskids.org.au).

## **9. SECURITY AND STORAGE**

9.1 We store your personal information in hard copy and electronically. [We take all reasonable and appropriate steps (including organisational and technological measures) to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

9.2 We only keep your personal information for as long as it is required for the purpose for which it was collected or as otherwise required by applicable laws. If we no longer need to hold your personal information for any reason or we are no longer required by law to keep it, we will take reasonable steps to de-identify or destroy that information. These steps may vary depending on the nature of the information, the way it was collected and how it was stored.

## **10. ACCESS TO AND CORRECTION OF YOUR INFORMATION**

10.1 We will endeavour to ensure that the personal information collected from you is up to date, accurate and complete.

10.2 [You may request access to, or correction of, the personal information we hold about you at any time by contacting our program administrator. We will need to verify your identity before responding to your request. Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time and usually within 28 days. If we decide to refuse your request, we will tell you why in writing and how to complain.

## **11. COMPLAINTS**

11.1 You can make a complaint in writing to our program administrator using the details set out in this Policy. We will respond to you within a reasonable period of time to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.

11.2 If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website, [www.oaic.gov.au](http://www.oaic.gov.au).

## **12. CONTACT US**

If you have a question or comment regarding this Policy or wish to make a complaint or exercise your privacy rights, please contact our program administrator on the following email [info@littlestarskids.org.au](mailto:info@littlestarskids.org.au).

Dated: October 2020