

# PRIVACY POLICY



All personal data collected in relation to these services will be processed in connection with our Privacy Policy. KidsCo is an Australian company and therefore all personal data processed by us to provide these services to you will be stored and processed in Australia by KidsCo and its service providers. KidsCo comply with the Australian Privacy Principles of the 1988 Privacy Act as amended, which is enforced by the Office of the Australian Information Commissioner. By booking this program, you consent to the processing of your personal data by KidsCo in Australia

KidsCo complies with GDPR regarding the collection, use, and retention of personal data we transfer from the European Union to Australia. KidsCo adheres to and has received a green rating for Information Security Checklist Report - ICO (Information Commissioners Office).

## 1. PROTECTING PRIVACY AND APPLICATION OF THIS PRIVACY POLICY

KidsCo Australia is committed to the protection of your personal information in accordance with the National Privacy Principles, and from 12 March 2014, the Australian Privacy Principles, set out in the *Privacy Act 1988*.

If anything in this Policy is inconsistent with any Federal, State or Territory law, the relevant Federal, State or Territory law prevails to the extent of the inconsistency.

This privacy policy describes the manner in which KidsCo may collect, hold and use personal information. By providing your personal information to KidsCo, you consent to its use, storage and disclosure in accordance with this privacy policy.

KidsCo Australia may, from time to time, review and update this privacy policy to adapt to changing business practices, and to take into account new laws and technology. The use, storage and disclosure of all personal information held by KidsCo will be governed by the most recent privacy policy, KidsCo Australia will notify you of any amendments by posting an updated version of the policy on this website.

## 2. WHAT IS "PERSONAL INFORMATION"?

"Personal information" means 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. Personal Information collected will differ depending on the relevant KidsCo, and may include (but is not limited to) the kinds of personal information set out in Item 5.1.

## 3. WHY IS PERSONAL INFORMATION COLLECTED?

KidsCo may collect personal information to allow it to conduct and administer its business functions and to market and provide its products and services.

## **4. HOW IS PERSONAL INFORMATION COLLECTED?**

Generally, KIDSCO will collect personal information directly from you. You may decide to provide your personal information to KidsCo for a range of different reasons.

- a. you may wish to attend a KidsCo activity or event;
- b. you may attend a KidsCo program and elect to provide your personal information while at the event;
- c. you may wish to apply for employment at, or volunteer for;
- d. you may wish to provide services to KidsCo; or
- e. you may enter a competition or promotion being conducted by an KidsCo.

4.2 Personal information can be collected by an KIDSCO in a number of ways and through a number of mediums. By way of example, personal information can be collected:

- a. when you provide your personal information, or agree to your personal information being provided via one of KidsCo Australia's websites.
- b. when you enter your personal information, or agree to your personal information being entered into one of KidsCo Australia's online IT systems including.
- c. when you email KidsCo or contact KidsCo by telephone or mail;
- d. when you engage with KidsCo via social media;
- e. when you elect to receive KidsCo related newsletters or other information;
- f. when you enter a competition that is being conducted by, or on behalf of, KidsCo;
- g. when you purchase other products or services from KidsCo
- h. when you provide KidsCo with information in an application or consent form, survey, feedback form or incident report.

4.3 KidsCo may collect personal information regarding a child from the parent or other 'responsible person' associated with that child. At times KidsCo may collect personal information regarding an adult from another 'responsible person' associated with that adult.

4.4 KidsCo may also collect and use personal information that is given to it by a third party in the course of its business, if that collection is reasonably necessary for KidsCo or the third party's legitimate functions or activities. Examples of such third parties could include, without limitation, schools who partake in KidsCo Australia programs or Law enforcement bodies.

## **5. WHAT PERSONAL INFORMATION MAY BE COLLECTED ABOUT YOU?**

5.1 The kinds of personal information that KidsCo collects about you will depend on the primary purpose for which such information was collected. KidsCo may collect and store various kinds of information about you in connection with its legitimate functions and activities, including, without limitation:

- a. 'contact information', such as your name, phone numbers, address details, email address and social media details;

- b. your date of birth, age, gender;
- c. details of KidsCo programs that you have participated in and the organisations that you have participated with;
- d. details of a disability you may suffer, if you elect to provide that information to allow KidsCo to provide you with relevant services and information;
- e. details of your cultural background, nationality, and language(s) spoken, if you elect to provide that information to allow KidsCo to provide you with culturally sensitive information and services;
- f. copies of communications between an KidsCo and you;
- g. other personal information provided voluntarily by you. For example, this could be information provided in response to surveys or competitions;
- h. payment details, if you apply for membership, purchase of goods or services from, or make other payments to KidsCo or their agents, licensees or contactors;
- i. details of your academic qualifications, results, professional interests, reference checks, car registration and drivers licence details (if applicable), if you apply for employment with KidsCo;
- j. background checks, including reference checks, police checks, working with children checks and completed member protection declarations and related documents. This information may be obtained and retained about you if:
  - i. you apply for, and/or obtain employment positions;
  - ii. you apply for and/or obtain KidsCo Australia Teacher Membership;
  - iii. you are proposing to, or provide certain services to KidsCo;
  - iv. you apply for and/or obtain accreditation from KidsCo;
  - v. you are a KidsCo student participating in one of our programs; or
  - vi. KidsCo otherwise considers it appropriate to obtain background checks in relation to you before entering into contracts, arrangements or understandings with you, or entities related to you;
- k. medical information and emergency contact details. For example, this information may be held about you if you are a KidsCo student;
- l. non-personally identifiable information, such as your IP address, browser type, web pages visited etc.; and/or
- m. other personal information that is relevant to the conduct of KidsCo's legitimate activities.

5.2 Some of the information that you give to KidsCo may be required. Other information may be optional. If you do not give an KIDSCO some of, or all, the personal information that it requests, it may affect KidsCo's ability to communicate with you. It may also affect KidsCo's ability to provide products or services to you and it may affect your ability to participate in programs conducted by KidsCo or apply for employment with KidsCo. If it is impracticable for KidsCo to deal with you in circumstances where you

have not provided the information or consents that it has requested, it may decline to do so.

## **6. PERSONAL INFORMATION COLLECTED VIA WEBSITES**

6.1 KidsCo will not collect any personal information about users of Websites except when they knowingly provide it or as otherwise described below.

6.2 When you visit and browse a KidsCo website, the relevant website host may collect information for statistical, reporting and maintenance purposes.

6.3 The information collected by a Website's website host is used to administer and improve the performance of the Website and to better understand what is of interest to you. The information may include:

- a. the number of users visiting the Website and the number of pages viewed;
- b. the date, time and duration of a visit;
- c. the IP address of your computer; and
- d. the path taken through the Website.

### *Cookies*

6.4 Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. Cookies may be used on our website to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our website.

6.5 Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using. If you access the Website or click-through an email we send you, a cookie may be downloaded onto your computer's hard drive.

6.6 Cookies may also be used to improve the operation of a Website and to better understand what is of interest to you.

6.7 You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

6.8 If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

6.9 Web beacons are images that originate from a third party site to track visitor activities. KIDSCOs may use web beacons to track the visiting patterns of individuals accessing a Website.

## **7. HOW CAN AN KIDSCO USE AND DISCLOSE THE PERSONAL INFORMATION IT COLLECTS ABOUT YOU?**

7.1 KidsCo may use and disclose your personal information for the primary purpose for which it was collected, and secondary purposes related to the primary purpose. You acknowledge that such primary and secondary purposes may include, without limitation:

- a. to verify your identity
- b. to complete and retain background checks;
- c. to provide you with products or services you have requested;
- d. to provide you with information about relevant activities and opportunities;
- e. to disclose to an KIDSCO's professional advisors, including accountants, auditors and lawyers, or insurers or insurance brokers, when considered necessary or appropriate;
- f. to assist law enforcement bodies, when considered necessary or appropriate;
- g. for direct marketing communications from KidsCo in relation to products, including targeted online advertisements, services, and special offers made available by either the same or their respective corporate partners, licensees, sponsors, suppliers and broadcasters (who may, at times be outside Australia), where you have consented to receive such communications or would reasonably expect to receive such communications, and have not requested not to receive such communications. You will be able to opt-out of direct marketing at any time if you so choose, by utilizing the unsubscribe feature on electronic marketing communications, or in the case of other direct marketing materials contacting KidsCo in accordance with Item 10 below; and
- h. where permitted by KidsCo, to enable third party corporate partners, licensees, sponsors, suppliers and broadcasters who have a relationship with KidsCo, to market and promote their products and services to you where you have consented to receive such communications or would reasonably expect to receive such communications, and have not requested not to receive such communications. You will be able to opt-out of direct marketing at any time if you so choose, by utilizing the unsubscribe feature on electronic marketing communications, or in the case of other direct marketing materials contacting KidsCo in accordance with Item 10 below.

7.2 KidsCo may have contractual relationships with a number of third party suppliers and IT System administrators who assist KidsCo, for example IT vendors who develop, test and maintain IT Systems and Websites or medical consultants who provide medical services. At times, the third party suppliers and IT System administrators may have access to your personal information in the course of supplying products and services to KidsCo at times these third party suppliers and IT System administrators may be located outside Australia. These third party suppliers and IT System administrators will be required to protect your personal information on the terms set out in their contract with KidsCo.

7.3 Kidsco will not otherwise disclose personal information without permission, unless the disclosure is:

- a. in accordance with this Privacy Policy or any agreement with the individual; or
- b. required or authorised by law, including without limitation the National Privacy Principles, and from 12 March 2014, the Australian Privacy Principles, under the *Privacy Act 1988 (Cth)*.

## **8. STORAGE AND SECURITY OF PERSONAL INFORMATION**

8.1 KidsCo aims to keep your personal information secure. Any personal information that is collected via a Website or which is held on KidsCo's IT System is protected by reasonable safeguards which may include firewalls and encryption.

8.2 If KidsCo finds that it has no further need for your personal information it may remove it from its IT Systems and destroy all record of it.

## **9. HOW TO CORRECT AND ACCESS PERSONAL INFORMATION**

9.1 If you provided your personal information via an IT System or Website, you can update your personal information in that IT System or Website at any time by logging onto the relevant IT System or Website and submitting the updated information. Alternatively, you can contact KidsCo in accordance with Item 10 to request that they update the personal information they hold about you.

9.2 You may be entitled to access personal information that KidsCo holds about you. You can request access to the personal information by contacting KidsCo in accordance with Item 10. KidsCo may charge a reasonable fee where access is provided. There may be some legal or administrative reasons to deny access. If KidsCo refuses your request to access your personal information, it will provide you with reasons for the refusal.

## **10. WHO TO CONTACT ABOUT PRIVACY MATTERS**

KidsCo Australia is responsible for protecting the personal information that it holds about you in accordance with this privacy policy. If you have any queries you should contact the relevant responsible directly.

If you would like to access the personal information that KidsCo Australia holds about you, have a complaint or would like further information about this privacy policy, you can contact KidsCo Australia's privacy officer either:

- a. by email to: [yoothoo@KidsCo.net.au](mailto:yoothoo@KidsCo.net.au); or
- b. by writing to: KidsCo Australia, 85C Queens Bridge Street, Southbank, Victoria 3006.

KidsCo Australia will investigate your queries and complaints within a reasonable period of time and will notify you of the outcome of our investigation.