

PRIVACY POLICY

Kids Thrive Inc

ABN 55 761 065 774

Version 1.2

Last updated 19 April 2023

Table of Contents

1. Overview	2
2. How We Collect Information	2
3. How We Use Information	3
4. How We Store Information	4
5. How We Deidentify and Destroy Information	4
6. Quality Assurance	4
7. Data Security and Retention	4
8. Accessing and Correcting Your Information	5
9. Identifiers	6
10. Anonymity	6
11. Making Information Accessible to Others	6



1. Overview

1.1. Introduction: The Kids Thrive Committee of Management is committed to protecting the privacy of personal information which the organisation collects, holds, and administers. Personal information is information which directly or indirectly identifies a person.

1.2. Purpose: The purpose of this document is to provide a framework for Kids Thrive in dealing with privacy considerations

1.3. Responsibilities:

1.3.1. The Kids Thrive Committee of Management is responsible for developing, adopting and reviewing this policy.

1.3.2. The Kids Thrive CEO is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

2. How We Collect Information:

2.1. Kids Thrive will:

2.1.1. Only collect information that is necessary for the performance of the organisation.

2.1.2. Collect personal information only by lawful and fair means and not in an unreasonably intrusive way.

2.1.3. Notify stakeholders about why we collect the information and how it is administered.

2.1.4. Collect personal information from the person themselves wherever possible.

2.1.5. If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.

2.1.6. Collect sensitive information (including health information or information about religious beliefs, race, gender and others) only with the person's explicit consent or if required by law and/or if such collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any individual where the individual whom the information concerns:

- is physically or legally incapable of giving consent to the collection;
- or physically cannot communicate consent to the collection



3. How We Use Information

3.1. Kids Thrive will:

- 3.1.1. Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- 3.1.2. For other uses, Kids Thrive will obtain consent from the affected person.
- 3.1.3. In relation to a secondary purpose, use or disclose the personal information only where:
 - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - the person has consented; or
 - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.

3.2 In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and Kids Thrive has provided an opt out and the opt out has not been taken up.

3.3 In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).

3.4 In each direct marketing communication with the individual, Kids Thrive draws to the individual's attention, or prominently displays a notice, that he or she may express a wish not to receive any further direct marketing communications.

3.5 Provide all individuals access to their personal information on request, except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that their personal information is not accurate, then Kids Thrive must take steps to correct it.

3.6 Where for a legal or other reason we are not required to provide a person with access to their information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.

3.7 Each written direct marketing communication must include a direct email contact to Kids Thrive via admin@kidsthive.org.au

3.8 If Kids Thrive has sufficient reasons to believe that an unlawful activity has been, is being or may be engaged in, and the disclosure of personal information becomes a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities, the organisation may make such disclosures.



3.9 Kids Thrive may further disclose personal information if its disclosure is mandated by an enforcement body or is required for the following:

- the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law;
- the enforcement of laws relating to the confiscation of the proceeds of crime;
- the protection of the public revenue;
- the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct;
- the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.
- For the purpose of this clause, Kids Thrive must make a written note of the use or disclosure for internal reference.

4. How We Store Information

4.1. Kids Thrive will implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.

5. How We De-Identify and Destroy Information

5.1. Kids Thrive will:

- 5.1.1. Destroy personal information once it is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- 5.1.2. Change information to a pseudonym or treat it anonymously if required by the person whose information Kids Thrive holds and will not use any identifiers unless they are reasonably necessary for our functions.

6. Quality Assurance

6.1. Kids Thrive will take reasonable steps to ensure the information Kids Thrive collects is accurate, complete, up to date, and relevant to the functions we perform.

7. Data Security and Retention

7.1. Kids Thrive will only destroy records in accordance with Australian Privacy Law and Practice.



8. Accessing and Correcting Your Personal Information

8.1. Kids Thrive will:

- 8.1.1. Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading, or not up to date.
- 8.1.2. If the individual and Kids Thrive disagree about whether the information is accurate, complete and up to date, and the individual asks Kids Thrive to associate with the information a statement claiming that the information is not accurate, complete or up to date, Kids Thrive will take reasonable steps to do so.
- 8.1.3. Kids Thrive will provide to the individual its reasons for denial of access or a refusal to correct personal information.
- 8.1.4. Kids Thrive can withhold the access of an individual to their information if:
 - providing access would pose a serious and imminent threat to the life or health of any individual; or
 - providing access would have an unreasonable impact upon the privacy of other individuals; or
 - the request for access is frivolous or vexatious; or
 - the information relates to existing or anticipated legal proceedings between the organisation and the individual, and the information would not be accessible by the process of discovery in those proceedings; or
 - providing access would reveal the intentions of the organisation in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
 - providing access would be unlawful; or
 - providing access would be likely to prejudice an investigation of possible unlawful activity; or
 - an enforcement body performing a lawful security function asks Kids Thrive not to provide access to the information on the basis that providing access would be likely to cause damage to the security of Australia.

8.2 Where providing access would reveal evaluative information generated within the organisation in connection with a commercially sensitive decision-making process, Kids Thrive may give the individual an explanation for the commercially sensitive decision rather than direct access to the information. If Kids Thrive decides not to provide the individual with access to the information, Kids Thrive will allow access as much as reasonably possible to meet the needs of both parties.

8.3 Kids Thrive will make no charge for providing access to personal information.



9. Identifiers

9.1. Kids Thrive will not adopt as its own identifier of an individual, an identifier that has been assigned by any third party. It may however adopt a prescribed identifier by a prescribed organisation in prescribed circumstances

9.2. Kids Thrive will not use or disclose the identifier assigned to an individual by a third party unless:

- the use or disclosure is necessary for the organisation to fulfil its obligations to the agency; or
- the use or disclosure is by a prescribed organisation of a prescribed identifier in prescribed circumstances.

10. Anonymity

10.1. Where practical, Kids Thrive will allow people from whom the personal information is being collected to not identify themselves and/or use a pseudonym.

11. Making Information Available to Others

11.1. Kids Thrive can release information to third parties where it is requested by the individual concerned. This request must be provided to Kids Thrive in writing.

