

GOANNA ACADEMY PRIVACY POLICY

1. Introduction

This Privacy Policy covers the Goanna Academy and each of its associates, related entities and subsidiaries (together, "we," "us," "our," and the "Goanna Clinic"). For the avoidance of doubt, a reference in this Privacy Policy to the Goanna Academy (including the Goanna Clinic doing or not doing an act) is a reference to, and is intended to also cover, the States. Please read this Privacy Policy carefully as it describes how we collect, use, disclose and otherwise handle your Personal Information.

The Goanna Academy recognises the importance of your privacy and your right to control your Personal Information and is committed to complying with applicable privacy laws (including the Privacy Act and GDPR).

The Goanna Academy is always seeking to better understand how Participants interact, communicate and otherwise share Personal Information in order to continue to develop the Goanna Academy and Goanna Clinic. The Goanna Academy has worked to establish and administer a data storage architecture for processing your Personal Information.

2. Anonymity and pseudonymity

We offer you the opportunity, wherever it is lawful and practicable, of not identifying yourself, or of using a pseudonym, when entering transactions, or otherwise dealing with, the Goanna Academy in relation to a particular matter by contacting the Goanna Academy Privacy Officer (see clause 11).

3. What kinds of personal information do we collect?

3.1 The types of Personal Information the Goanna Academy may collect depends on the purposes for which it is collected but may include (without limitation):

(a) your name, gender, date of birth, residential address, email address, telephone number, ethnicity, school name and other contact details;

(b) your favourite Sports Team and other information dealings with the Goanna Academy

3.2 The Goanna Academy will not collect Sensitive Information about you unless:

(a) you have consented to the collection of such specific Sensitive Information;

(b) the collection is required or authorised by law; or

(c) the collection is otherwise permitted under applicable privacy laws (including the Privacy Act and GDPR).

In addition to Personal Information, we use cookies, web beacons and other technologies on our website and applications to collect information about your usage of our services (for instance, third party websites you visit to better understand your preferences and what types of information and services you may be interested in).

4. How do we collect your personal information?

4.1 Where it is reasonable and practicable to do so, the Goanna Academy will collect your Personal Information from you. If you are a Minor, the Goanna Academy may collect Personal Information about you from your parent or legal guardian.

5. Why do we collect, use, hold and disclose your personal information?

5.1 The Goanna Academy generally only collects, uses, discloses or holds Personal Information that is reasonably necessary for the Goanna Academy to perform one or more functions or activities in administering mental health and wellbeing events (the primary purpose), including:

(a) organisation, conduct and promotion of Clinics, Services and Events (including for the purpose of providing information and making ticket offers to you);

(b) direct communication with you by Goanna Academy Administrators;

(c) disclosure to Partners, unless you have indicated that you do not want to receive any communication from Goanna Academy Partners;

(e) serving content in accordance with your preferences and previous consumption; and

(f) serving advertising that is suited to your age.

5.2 Wherever practicable, the Goanna Academy will inform you more specifically of the primary purpose of a collection as part of its collection statement, which will be made available to you at the time of the collection.

5.3 When we collect your Personal Information, your Personal Information will only be used or disclosed for the primary purpose for which it was collected, a related secondary purpose, in accordance with any express consent you grant the Goanna Academy or as otherwise lawfully required (e.g. where your Personal Information is requested by a law enforcement agency).

Direct Marketing

5.4 The Goanna Academy may use or disclose your Personal Information to a Partner for the secondary purpose of direct marketing communication, if:

(a) the Goanna Academy collected the information from you;

(b) you would reasonably expect your Personal Information would be used or disclosed for direct marketing;

(c) the Goanna Academy has provided a simple means by which you can request not to receive direct marketing; and

(d) you have not made a request not to receive direct marketing.

5.5 Where you would not reasonably expect your Personal Information to be used for direct marketing, or the information has been collected from a third party, the Goanna Academy may use the information for the secondary purpose of direct marketing communication only where:

(a) you have expressly consented to the use or disclosure for direct marketing, or it is impracticable for the Goanna Academy to seek your consent before that use;

(b) you have not made a request to the Goanna Academy not to receive direct marketing communication;

(c) in each direct marketing communication, the Goanna Academy always prominently displays a simple notice or actionable option that you may express a wish not to receive any further direct marketing communication; and

(d) each written direct marketing communication by the Goanna Academy with you sets out the Goanna Academy's contact details including business address, telephone and fax numbers and email address.

6. Who do we disclose your personal information to?

6.1 Subject to compliance with applicable privacy laws (including the Privacy Act and GDPR) and this Privacy Policy, the Goanna Academy may also:

(a) disclose your Personal Information to its partners and affiliates

7. Data quality and security

7.1 The Goanna Academy will take reasonable steps to:

(a) make sure that the Personal Information it collects, uses or discloses is accurate, complete and up-to-date; and

(b) protect the Personal Information it holds about you or that is within its direct control from misuse, interference and loss and from unauthorised access, modification or disclosure.

7.2 The Goanna Academy will take reasonable steps to destroy or permanently de-identify Personal Information if it is no longer needed for any purpose for which the information may be

used or disclosed (at your request or otherwise) or if you withdraw your consent, unless the Goanna Academy is required by or under law, or a Court order, to retain such information. Where the Goanna Academy is required to destroy or permanently de-identify your Personal Information, it will take reasonable steps to inform other parties using, holding or disclosing the same Personal Information (including any links to, copies of or replication of that Personal Information).

8. Openness, access and correction

8.1 The Goanna Academy strives to provide you with the greatest available control of the Personal Information which the Goanna Academy collects from you or about you from third parties. Accordingly, the Goanna Academy is continually developing and enhancing the ways which you can access your Personal Information.

8.2 The Goanna Academy will provide you with a variety of ways to access, review and manage your Personal Information. If you don't have an Goanna Academy Member Account, you can still opt out of and otherwise manage your communications preferences via links in emails and other communications we send to you from time to time. You will be responsible for ensuring your Personal Information remains accurate, complete and up to date.

8.3 Separate from the preference centre and upon your request, the Goanna Academy will take reasonable steps to let you know, in general terms, what sort of Personal Information it holds, for what purposes, and how it collects, holds, uses and discloses that information. Where the Goanna Academy has collected your Personal Information from you directly or with your consent, you have a right to receive (upon request) that Personal Information from the Goanna Academy in a structured, commonly used, machine readable format and/or a right to instruct the Goanna Academy to transmit that Personal Information to a third party (if technically feasible).

8.4 Before supplying any Personal Information to you or updating your Personal Information at your request, the Goanna Academy must be reasonably satisfied as to your identity (for example, by asking to see your passport or driver's licence). The Goanna Academy is not under any obligation to provide Personal Information to you where the Goanna Academy is not required to do so under applicable privacy laws (including the Privacy Act and GDPR).

8.5 If the Goanna Academy refuses to provide you with access to Personal information it holds on you in the manner requested by you, the Goanna Academy will either:

(a) take such steps (if any) as are reasonable in the circumstances to give access to the information in a way that meets the needs of the Goanna Academy and you; or

(b) provide you with a written notice that sets out:

(i) the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and

(ii) the mechanisms available to complain about the refusal.

8.6 If:

(a) the Goanna Academy is satisfied that, having regard to a purpose for which the Personal Information is held, the information is inaccurate, out-of-date, incomplete or irrelevant or misleading; or

(b) you request the Goanna Academy to correct your Personal Information, the Goanna Academy will take reasonable steps to correct the Personal Information to ensure that, having regard to the purpose for which it is held, it is accurate, up-to-date, complete, relevant and not misleading. The Goanna Academy will not charge you for making such a request or for correcting the information.

8.7 If the Goanna Academy refuses to correct the Personal Information at your request, the Goanna Academy will provide you with a written notice that sets out the same matters listed in clause 8.5(b).

9. Transborder data flows

9.1 Subject to clauses 9.2, the Goanna Academy will not transfer your Personal Information to an overseas recipient unless it has first taken steps reasonable in the circumstances to ensure that the Personal Information that it transfers will not be held, used or disclosed by the recipient of the information inconsistently with, or otherwise in breach of, applicable privacy laws (including the Privacy Act and GDPR). For example, the Goanna Academy may adopt appropriate contractual clauses with overseas recipients that ensure their compliance with applicable privacy laws (including the Privacy Act and GDPR).

9.2 The Goanna Academy may transfer Personal Information about you to someone who is in a foreign country if:

(a) the Goanna Academy reasonably believes that the recipient is subject to a law or binding scheme that has the effect of protecting the information in a way that is, overall, substantially similar to applicable privacy laws (including the Privacy Act and GDPR) and there are mechanisms available to you to enforce that protection or scheme; and

(b) you expressly consent to the transfer after the Goanna Academy has informed you that the applicable privacy laws (including the Privacy Act and GDPR) will no longer apply if you provide your express consent.

10. Notifiable data breaches scheme

In the event of any loss, or unauthorised access or disclosure of your Personal Information that is likely to result in serious harm to you, the Goanna Academy will investigate and notify you

and where applicable the relevant supervisory authority (e.g. the Australian Information Commissioner) within 72 hours of becoming aware of the loss, or unauthorised access or disclosure, in accordance with applicable privacy laws (including the Privacy Act and GDPR).

11. Inquiries procedure

11.1 All complaints and inquiries concerning your Personal Information, including in respect of alleged breaches of this Privacy Policy or applicable privacy laws (including the Privacy Act and GDPR), should be directed to the Goanna Academy Privacy Officer:

The Privacy Officer
Goanna Academy
info@goannaacademy.com.au

11.2 At all times, privacy complaints will be treated seriously, dealt with promptly and confidentially, and will not affect your existing obligations or commercial arrangements with the Goanna Academy.

12. Privacy Policy updates

This Privacy Policy was updated in August 2020. We may update this Privacy Policy from time to time, in which case we will post the updated version of the Privacy Policy on our website (www.goannaacademy.com.au). As such, please check back periodically to see if our Privacy Policy has been updated.

13. Definitions

In this Policy:

GDPR means the European Union General Data Protection Regulation.

Minor means any person younger than 16 years of age.

Goanna Academy Privacy Officer means the person appointed by the Goanna Academy from time to time to deal with complaints and inquiries under this Privacy Policy.

Personal Information means any information or an opinion about an identified natural person, or a natural person who is reasonably identifiable whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

Participant means participants in the Goanna Clinics including the Participants and Officials.

Participant means any person who is, from time to time, registered to a Goanna Clinic, whether that person is male or female, minor or adult.

Privacy Policy means this document as updated from time to time and made available on the Goanna Academy Website (goannacademy.com.au)

Goanna Academy Partners means any entity that has a commercial agreement or arrangement with the Goanna Academy, and which you may also have a direct relationship with (including by participation in a Clinic).

Sensitive Information means information or an opinion about a natural person's racial or ethnic origin, political opinions, membership of political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record that is also Personal Information as well as health information, genetic information, biometric information for the purposes of verification/identification and biometric templates about a natural person.