

# Privacy Policy



**PRIDE MENTORING PTY LTD - ACN 658 330 164, trading as “Pride Professionals”** (‘Pride Professionals’ ‘we’ ‘our’ or ‘us’) is committed to ensuring that we, as data controllers, meet our ongoing obligations to you with respect to your personal information that we collect and use. We have adopted the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (the **Act**) to govern the way in which we collect, use, disclose, store, secure and dispose of your personal information.

By providing us with your personal information, you are consenting to this Privacy Policy and to the collection, access, storage, transfer, and/or processing of your personal information as described in this policy.

## **1. Purpose and Scope**

This policy applies to:

- Pride Professionals as collectors and users of personal information, and
- Pride Professionals Directors, employees, officers, contractors, and any third parties who provide personal information to us.

The purpose of this Privacy Policy is to outline what personal information we collect and hold, the purposes for which we collect and hold it, and how that information is collected, held, used, disclosed, stored, and how it can be accessed.

## **2. What is Personal Information?**

The term ‘Personal Information’ is defined in the Act, and means any information or opinion from which your identity is evident. This may include information or an opinion about you, regardless of if it is true or not.

It may also include ‘Sensitive Information’. This includes any information about your racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, or health information. We will not ask you to disclose sensitive information unless it is necessary for providing our services to you. However, if you elect to provide unsolicited sensitive information it may be captured and stored.

## **3. What Personal Information do we Collect?**

The Personal Information that we collect about you depends on the nature of the business relationship or agreement that we have with you. In all cases the information we collect is necessary for carrying out that business relationship or agreement. The Personal Information that we collect may include:

- Your name, phone numbers, email address, physical address, and other contact information, and
- Records and the content of communications that you have with us whether in person, on the phone, in writing, or through any other means.

For those who participate in programs (e.g., mentoring programs) that we facilitate, or complete a survey, questionnaire, or psychometric assessment during the course of our business relationship, we may also collect the following information;

- Your date of birth or age
- Your gender
- Your employment history
- Other demographic information
- Your interests or hobbies
- Any information and responses obtained from any questionnaire, survey, or assessment that you complete

When we collect your Personal Information, we will endeavour, where appropriate and practicable, to explain why we are collecting the information and how we will use it.

#### **4. How do we Collect Personal Information?**

We collect Personal Information through a variety of ways, however, most commonly this occurs when you provide that information directly to us in person, by phone, or in writing (e.g., electronically or by letter). We may also collect Personal Information through our survey and forms platform, or other registration forms.

We endeavour to collect your Personal Information directly from you; however, we may also collect it from a third party where necessary, or from publicly available sources of information. In the case where your Personal Information is not collected directly from you, we will take reasonable steps to ensure that you are informed of the source of that information.

#### **5. How do we Use Personal Information?**

Unless you provide us with your consent, or where we are otherwise permitted to do so by law, we will only use your Personal Information for the purposes for which it was provided (primary purpose) or for a purpose related to the primary purpose (secondary purpose) in circumstances where you would reasonably expect such use or disclosure.

We use Personal Information to enable us to provide our services, for purposes including:

- The delivery of our mentoring programs, or
- Other services which form part of the deliverables we are engaged to provide.

We may also use your Personal Information for purposes that should be reasonably expected by you and are related to those purposes mentioned above.

We may also use your Personal Information for the purposes of verifying your identity when you deal with us, or directly marketing to you to promote our services or products. You can unsubscribe from direct marketing at any time by contacting us on [admin@prideprofessionals.com.au](mailto:admin@prideprofessionals.com.au)

Any Sensitive Information we collect, we will only use:

- For the primary purpose for which it was obtained,

- For a secondary purpose that is directly related to the primary purpose,
- With your consent, or
- Where required or authorised by law.

## **6. Disclosure of Personal Information to Others**

We may occasionally outsource some services and/or processes to vendors and may therefore transfer or disclose your Personal Information in certain circumstances, to the following third parties:

- External service providers who assist us in the delivery of some of the services you receive, by providing functions such as:
  - information technology services
  - survey software
  - psychometric evaluations or skills tests
  - transaction processing
- Government authorities, as required or authorised by law,
- Where you provide your consent to the disclosure (whether express or implied), or
- Those to whom you expressly ask us to send, or consent to us sending, your Personal Information.

These third parties will only be permitted to obtain the Personal Information that they require to deliver the services which they are providing us. Where practicable, we will take all reasonable steps to ensure that these organisations, to whom we disclose your Personal Information, are aware of this Privacy Policy and our obligations to you under it and have made a commitment to protect your Personal Information and/or are bound by confidentiality requirements in relation to your information.

Some of these third parties operate worldwide or may be based outside of Australia in order to provide us with the services required for the operation of our business, and/or support our ability to deliver our services (e.g., survey software, data storage, etc.). When the use of such third parties is required, we will endeavour to further safeguard your Personal Information using our internal policies, procedures, and/or protocols.

## **7. The Security of your Personal Information**

We take all practical measures to ensure that the Personal Information we store is secure and can only be accessed by authorised persons. We store your Personal Information in a manner that utilises reasonable standards of technology and operational security measures that protects your Personal Information from loss, misuse, unauthorised access, modification or disclosure.

However, except to the extent that statutory liability cannot be excluded, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your Personal Information. Nothing in this Privacy Policy restricts, excludes or modifies any statutory rights under any applicable law.

## **8. Deletion or De-Identification of your Personal Information**

When your Personal Information is no longer required for the purpose(s) for which it was collected, we will take all reasonable steps to destroy it. Where it is not possible to destroy your Personal

Information, it will be permanently de-identified. However, unless otherwise agreed, most Personal Information will be stored in client files which will be kept by us for a minimum period of seven (7) years.

If we receive written notification from you that you are withdrawing your consent to us storing and/or using your Personal Information, we will take reasonable steps to destroy it, unless we are required by law to retain that information.

## **9. Accessing your Personal Information**

You have the right to access your Personal Information that we hold, subject to any relevant exceptions, as allowed by law. If you wish to access your Personal Information, please contact us in writing at [admin@prideprofessionals.com.au](mailto:admin@prideprofessionals.com.au). In order to protect your Personal Information, we may require that you provide identification before releasing your information.

Pride Professionals will not charge any fee related to your access request, however, reserves the right to charge a reasonable administrative fee for locating and providing access to a copy of your information, assessed on a case-by-case basis.

If we are not able to provide you with access to your Personal Information, we will provide you with written notice which explains the reason(s) for our decision and the processes available to you to lodge a complaint.

## **10. Correcting your Personal Information**

It is important to us that your Personal Information is current and kept up to date. We strive to ensure that your Personal Information is accurate, complete, and up to date. Please advise us if you find that your information is inaccurate or has changed so that we can update or correct our records.

Any request to correct or update your Personal Information will be subject to the verification of your identity. If we are not able to provide you with the ability to correct or update your Personal Information, we will provide you with written notice which explains the reason(s) for our decision and the processes available to you to lodge a complaint.

## **11. Updates to this Policy**

We may change this Privacy Policy from time to time. If we make such changes, we will post the amended terms on our website. The revised version of this Privacy Policy will be effective from the time when it is posted.

## **12. Enquiries and Complaints**

If you have any questions, concerns, or complaints regarding our Privacy Policy, please contact us on [admin@prideprofessionals.com.au](mailto:admin@prideprofessionals.com.au), via the contact form on our website, or through the other contact information listed on our website.

The Directors, or other relevant privacy management representative will co-ordinate the investigation and resolution of any complaint, or the correction or updating of your Personal Information. If making a complaint or request ensure that sufficient details and any supporting evidence, information, or relevant documentation are provided. We will let you know if further information is required and provide you with a written response of action taken. We will aim to resolve any complaints or update your Personal Information as soon as practicable.

If you are unsatisfied with the outcome of a complaint made to us you can contact us directly for a further confidential discussion regarding the situation, or contact the Australian Privacy Commissioner on their website at <https://www.oaic.gov.au/privacy/privacy-complaints>.