

# Privacy Policy

## 1 Definitions

Term	Definition
Me/I/My	Creating Positive Spaces Pty Ltd ACN: 659 778 042 Director: Joey Camilleri
You/Your	A client or customer of Creating Positive Spaces or a user of my website
Website	<a href="http://www.creatingpositivespaces.com">www.creatingpositivespaces.com</a> or <a href="http://www.creatingpositivespaces.com.au">www.creatingpositivespaces.com.au</a>

## 2 Overview

This document sets out my Privacy Policy. It describes how I collect and manage your personal information when you interact with me and my business. I take this responsibility very seriously. If you have any questions or concerns about how your personal information is being handled, please do not hesitate to contact me:

Postal Address	Email	Phone
PO Box 3023, South Melbourne, VIC 3205	<a href="mailto:joey@creatingpositivespaces.com.au">joey@creatingpositivespaces.com.au</a>	0401 149 185

I choose to voluntarily comply with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) (Privacy Act). I understand that visitors from the EU may access this site, so I also aim to comply with the General Data Protection Regulations (GDPR).

## 3 Personal Information

### 3.1 If you engage with me or choose to become my client, I may collect the following kinds of personal information from you, including:

- a) contact details such as name, job role, job position or occupation, home address, business address, email address, phone numbers, emergency contact details, and the country that you live in;
- b) information relating to your circumstances and matters relevant to the areas in which we are working;
- c) information about your personal and business interests and requirements and the services that you may wish to engage me to provide;
- d) your opinion about future products or services that may interest you;
- e) information that allows me to tailor my content to your needs when you sign up for one of my webinars, workshop, seminars, presentations, promotional events or other events.

## 4 Collection and Use

### 4.1 I may collect your personal information by various means, including:

- a) website contact forms;
- b) registration for a webinar, workshop seminar or any other event organised, hosted or held by me;
- c) attendance at a webinar, workshop, seminar or any other event organised, hosted or held by me;
- d) through an opt-in form for my mailing list or newsletter;
- e) when communicating with me via email, on the phone or in-person;
- f) when you correspond with me on a social media platform such as Facebook, LinkedIn, Instagram or similar sites;
- g) when you respond to a testimonial request;
- h) when you become my client or purchase a product;
- i) when you provide information relating to you or your business;
- j) automatically, when you visit my website through the use of cookies; and
- k) through third parties, which may include referrals to me by support workers or health professionals.

### 4.2 I use this information to:

- a) respond to your enquiries;
- b) provide services to you at your request;
- c) monitor visitor and client satisfaction;
- d) help other people understand my services better;
- e) improve my products and services;
- f) provide you with more relevant information;
- g) provide you with relevant news and updates about my products and services;
- h) provide news and developments relating to our work together;

- i) improve my website and the services I provide;
- j) contact you about new offers and services; and
- k) inform you of upcoming webinars, workshops seminars, or any other events being organised, hosted or held by me.

#### **4.3 I will only collect your personal information:**

- a) with your full awareness and consent, such as when you email me, contact me via phone, tick a checkbox or fill in a form to provide me with information;
- b) if I need it to provide you with information or services that you request;
- c) for necessary administrative processes if you become my client; and
- d) if I believe that I can demonstrate a legitimate interest in using your data for marketing purposes, although I will always give you a choice to opt-out.

## **5 Sensitive Information**

**5.1 I understand that some personal information is particularly sensitive, and that you are trusting me to keep this information confidential. You may choose not to provide me with your sensitive information. If you decide not to provide me with the required sensitive information, I may not be able to provide you with the services that you request or provide the necessary level of service for your circumstances.**

**5.2 I will only collect sensitive information by methods that are reasonably secure, such as:**

- a) when you send me information in an email;
- b) when you provide information in a phone call or in-person;
- c) when you submit information through my website forms; and
- d) in a virtual or face to face consultation.

**5.3 It is recommended that you only provide me with sensitive information using the methods listed in section 5.2. If you are unsure about how to provide me with sensitive information, please contact me by phone or email.**

**5.4 The reason why I may collect this information is:**

- a) so that I can provide you with the services you have engaged me for;
- b) to ensure that I am providing you with the most appropriate services that meet your needs; and

- c) to determine if I am the right person to support you or your business.

**5.5 The sensitive information I may ask you to provide for this purpose may include:**

- a) your physical and mental health disabilities;
- b) your age;
- c) your family circumstances; or
- d) your living arrangements.

**5.6 I am committed to securely storing and handling your sensitive information. I store your sensitive information on third-party cloud storage that is password protected. Access to cloud storage is via a password-protected computer and/or a password or biometric verification smartphone or tablet. Only I have access to these devices. I use the following cloud storage providers to store sensitive information:**

- a) HubSpot;
- b) Google G Suite; and
- c) Microsoft 365 for Business.

If you are providing sensitive information in one of my website contact forms, this information may also be stored in WordPress.

You can find out more about their security provisions here:

- a) HubSpot Security - <https://www.hubspot.com/security>
- b) Google G Suite - [https://gsuite.google.com.au/intl/en\\_au/security/](https://gsuite.google.com.au/intl/en_au/security/)
- c) Microsoft 365 for Business - <https://www.microsoft.com/en-au/security/business>
- d) Wix - <https://www.wix.com/about/privacy>, section 13. Security
- e) WordPress - <https://automattic.com/privacy/>

**5.7 Sensitive information may be collected from children under the age of 18 under the following circumstances:**

- a) in the presence of their parents or guardian; and
- b) with their parent or guardian's full consent.

All information collected from minors is securely stored in accordance with this privacy policy.

- 5.8 All archived sensitive information is securely destroyed 7 years after you stop using my service.**
- 5.9 All archived sensitive information relating to services provided to children under the age of 18 will be securely destroyed 7 years after they turn 18 years old.**

## 6 Disclosure of Information

### 6.1 Reasons, why I may disclose your information, include:

- a) when required to carry out your instructions;
- b) to provide you with the services you have requested; and
- c) to send you products that you have purchased.

### 6.2 In order to do this, I may share some relevant information - on a strictly need to know basis - with:

- a) Australia Post, courier, companies, insurers, professional advisers, agents, suppliers or subcontractors; and
- b) With other service providers or support workers that you have requested I engage with on your behalf. This may include:
  - cleaners and rubbish removalist companies;
  - repair people;
  - storage specialists;
  - support coordinators and workers; and
  - doctors or mental health workers.

### 6.3 I will also disclose your information if required by law to do so or in the circumstances permitted by the Privacy Act. For example, where I have reasonable grounds to suspect that unlawful activity, misconduct of a serious nature, or conduct that poses a serious risk of harm to you or some other person, and that relates to my functions or activities has been, is being or may be engaged in, and in response to a subpoena, discovery request or court order. If you have any concerns regarding the disclosure of your information in this context, please do not hesitate to get in touch with me to discuss this personally.

### 6.4 I will use all reasonable means to protect the confidentiality of your information while in my possession or control. I will not knowingly share any of your information with any third party other than the service providers who assist me in providing the information and/or services I am providing to you. To the extent that I do share your information with a service provider, I would only do so if that party has agreed to comply with my privacy standards or I am satisfied that the service provider has a suitably protective policy of their own.

- 6.5 Some of my service providers may be overseas and may not be subject to Australian Privacy Laws or compliant with GDPR. Information that I collect may be stored, processed in or transferred to parties located in countries outside of Australia. Please contact me if you have any concerns about the potential disclosure of your information. Please also see the section on Security below.**

## 7 Security

- 7.1 I take reasonable physical, technical and administrative safeguards to protect your information from misuse, interference, loss, and unauthorised access, modification and disclosure. However, I cannot guarantee the security of any information that you transmit to me or receive from me. As a result, you agree that the transmission and exchange of information is carried out at your own risk.**

**7.2 I manage risks to your information by:**

- a) storing files securely;
- b) ensuring that only I have access to sensitive information;
- c) shredding hardcopy files before disposing of them;
- d) releasing information to service providers on a strictly need-to-know basis;
- e) conducting regular audits of my security systems; and
- f) only accessing your information on devices that I own and manage.

**7.3 In addition to the service providers mentioned above at 5.6, information relating to you may be stored with a third-party provider, where it will be managed under their security policy. Below are the third-party providers I currently use, with links to their security information:**

- a) Mailchimp - <https://mailchimp.com/about/security/>
- b) Dropbox - <https://www.dropbox.com/security>
- c) Facebook ads - <https://www.facebook.com/business/m/privacy-and-data>
- d) Zoom - <https://zoom.us/docs/en-us/privacy-and-security.html>
- e) Asana - <https://asana.com/security-statement>
- f) Wave - <https://my.waveapps.com/security/>
- g) Comments Plugin - <https://www.commentsplugin.com/privacy.html>
- h) Xero - <https://www.xero.com/au/about/legal/privacy/>

**7.4 From time to time, I may combine information provided by you with information gathered from:**

- a) Social media, for example, Facebook or LinkedIn;
- b) your Website; or
- c) personal contact.

If you do not wish this to occur, please contact me.

## 8 Cookies and Google Analytics, Third Party Websites

**8.1 My website uses cookies to analyse website traffic and help me provide a better website visitor experience. Cookies are small text files that are commonly used by websites to improve a user's experience, collect statistics or marketing information and provide access to secure areas. You can choose to configure your browser settings not to accept cookies.**

**8.2 My website uses cookies from WordPress and Google Analytics to monitor site performance and visitor information. The cookies used on my website may change without notice. In addition, cookies may be used to serve relevant ads to website visitors through third-party services such as Google Adwords. These ads may appear on this website or other websites you visit.**

**8.3 I use Google Analytics to collect information about your use of my website so that I can get strategic information about how my website is being used and improve its functionality. You can find out more about the information Google collects and how it is used here:**

- a) <https://support.google.com/analytics/answer/6004245>.

**8.4 Google also provides an add-on for your browser that you can use to opt-out and prevent your data being used by Google Analytics. You can access that add-on here:**

- b) <https://-tools.google.com/dlpage/gaoptout>

**8.5 My website and social media accounts may, from time to time have links to other third-party websites. I do not own or control these websites. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. I am not responsible for the privacy practices of other such websites. I encourage my users to be aware, when they leave my website, to read the privacy statements of each website that collects personal identifiable information.**

## 9 Access to Information

- 9.1 You can contact me to access, correct or update your personal information at any time. Unless I am subject to a confidentiality obligation or some other restriction on giving access to the information which permits me to refuse you access under the *Privacy Act*, and I believe there is a valid reason for doing so, I will endeavour to make your information available to you within 30 days.

## 10 Complaints

- 10.1 If a breach of this Privacy Policy occurs, or if you wish to request a change to your personal information, you may contact me by sending an email outlining your concerns to [joey@creatingpositivespaces.com.au](mailto:joey@creatingpositivespaces.com.au).
- 10.2 If you are not satisfied with my response to your complaint you may seek a review by contacting the Office of the Australian Information Commissioner using the information available at <http://www.oaic.gov.au/privacy/privacy-complaints>.

## 11 Notification of Change

- 11.1 If I decide to change my Privacy Policy, I will post a copy of the revised policy on my website.
- 11.2 All modifications will be effective immediately upon my posting of the modified policy on my website.
- 11.3 It is your responsibility to ensure you are familiar with my most recent Privacy Policy.

## 12 Notification of Breach

- 12.1 If I have reason to suspect that a serious data breach has occurred and that this may result in harm or loss to you, I will immediately assess the situation and take appropriate remedial action. If I still believe that you are at risk, I will notify the Office of the Information Commissioner and either notify you directly, or if that is not possible, publicise a notification of the breach on this website.