PRIVACY POLICY

We, at Corporate Leadership Coaching (ABN 81 157 310 618) Helen Luxford and related brands, ("we", "our", "us"), are committed to protecting your privacy according to the Australia Privacy Principles (the APP). We aim to take reasonable steps in implementing practices, procedures and systems appropriate to our business activities that ensures our compliances with the APP and enables us to deal with related complaints and enquiries. This policy statement outlines our commitment, including the way we collect, store and use your personal or sensitive information and who to contact should you wish to:

- access or correct your personal or sensitive information or;
- enquire or submit a complaint about your privacy.

This Privacy Policy does not apply to personal information collected by Corporate Leadership Coaching or Helen Luxford that is exempted under the Privacy Act, for example employee records. This policy is designed to assist people to understand how their Personal Information, when collected through this website www.corporateleadershipcoaching.com.au (Site), is managed by Corporate Leadership Coaching.

Please read this Privacy Policy carefully. Please contact us if you have any questions.

You providing us with personal information indicates that you have had sufficient opportunity to access this Privacy Policy and that you have read and accepted it.

If you do not wish to provide personal information to us, then you do not have to do so, however it may affect your use of this Site or any products and services offered on it.

Corporate Leadership Coaching is the registered business of Mrs. Helen Luxford and provides coaching, training and mentoring services to individuals and organisations. The nature of the services provided means that we may collect personal or sensitive information about our clients, their business, customers, suppliers, competitors and their employees for the purpose of providing services. In the event that we are using, collecting or storing personal or sensitive information outside of the jurisdiction of Australia, we will comply with the privacy laws applicable to that jurisdiction.

This privacy statement is available on our website (<u>www.corporateleadershipcoaching.com.au</u>) and you can request a copy at any time, although an administration fee may be charged, by contacting us as outlined below.

1. Type of personal information collected

Personal or sensitive information is any information or opinion that can be associated with a specific person and can be used to identify that person and includes your information, whether;

- true or not;
- materially recorded or not or;
- the individual is identifiable or reasonably identifiable.

Examples of Personal information includes, but is not limited to, the individuals name, contact number and email address. Examples of sensitive information includes, but is not limited to, ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations,

philosophical beliefs, membership of a personal or trade association or union, sexual preferences or practices, criminal record, health or genetic information.

If you do not provide your consent for us to collect, use or store your personal or sensitive information it may reduce our capacity to provide appropriate services to you, as required. If you have objections to the Privacy Policy, you should advise us prior to agreeing to receive any services by contacting us as detailed below.

The type of personal information we collect includes the following:

- Name
- Organisation and job title
- Contact information including phone number and email address
- Demographic information such as postcode, preferences and interests
- Other information relevant to customer surveys, organisational requirements and/or offers

When you visit our website we also collect non personal information such as your Internet Protocol ("IP") address, this is used to better understand aspects of our visitors such as geography and network provider information.

2. Collection and use of personal information

We use a secure third party provider to collect personal information to contact and communicate with you, for internal record keeping and for marketing purposes. We also analyse and store information about how you interact with our website, this allows us to better target our interaction with you, analyse trends and improve our services. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes. Most web browsers are set to accept cookies. Corporate Leadership Coaching uses cookies to make your use of our website and services as convenient as possible. Cookies are useful to estimate our number of visitors and to determine overall traffic patterns through our website. If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of our website.

As generally accepted, most companies use cookies and we use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. We use cookies to improve the experience of people using our website. Cookies may collect and store your personal information. This Privacy Policy applies to personal information collected via cookies. You may adjust your internet browser to disable cookies. If Cookies are disabled, we may not be able to provide you with the full range of our services.

You also may encounter Cookies used by third parties and placed on certain pages of the Website that we do not control and have not authorised (such as webpages created by another user). We are not responsible nor liable for the use of such Cookies.

The Website may also include links to third party websites (including links created by users or members) and applications and advertising delivered to the Website by third parties (Linked Sites). Organisations who operate Linked Sites may collect personal information including through the use of Cookies. We are not responsible nor liable for Linked Sites and recommends that you read the privacy policies of such Linked Sites before disclosing your personal information.

To ensure Corporate Leadership Coaching is effectively able to service our clients, we will collect personal or, where necessary, sensitive information. We will only collect sensitive information with the clients' consent where such information is necessary in order to undertake our business activities as required.

Examples of when sensitive information may be disclosed by a client and collected by us includes, but is not limited to:

- when a person identifies as an Aboriginal or Torres Strait Islander
- where a client discloses sensitive information during a coaching session

Corporate Leadership Coaching may collect personal or sensitive information in a number of ways, including, but not limited to:

- Written form (eg. Filling out a form, submitting an enquiry via our website or leaving a comment on social media posts or sending a message through social media, leaving your business card at an event we are hosting, email, post, letter or fax)
- Verbally (eg. During a coaching, mentoring, training session or conversation)
- In person (eg. At an event we are hosting, during a conversation or a meeting with us)
- From publicly available records
- From a third party

3. Disclosure of personal information

Your personal or sensitive information may be accessible by other authorised third parties, on a need to know basis, for the purpose of ensuring we can provide services to you as agreed and carry on our business as required. This includes but is not limited to handling customer support enquiries, processing transactions, tailoring our service to your individual requirements or meeting compliance obligations. We may occasionally hire other companies or sole traders to provide services on our behalf or be required to disclose personal or sensitive information as compelled by law. For example, Corporate Leadership Coaching may engage with an external provider to seek advice and support in the event we have legitimate concerns for your health and safety or the health and safety of others.

Other companies will be permitted to obtain only the personal or sensitive information they need to deliver the required service. Corporate Leadership Coaching takes reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal or sensitive information.

4. Access to, use of and correction of personal information

Access: You may request details of personal information that we hold about you, in certain circumstances set out in the Privacy Act 1988 (Cth). An administrative fee may be payable for the provision of information.

Use of: Corporate Leadership Coaching may use your personal or sensitive information for the purpose of undertaking our business activities, including, but not limited to, providing appropriate service to our clients, administration and compliance, where compelled to by law, or where we have a legitimate concern about the health and safety of our clients' or other people.

For each visit to our website (www.corporateleadershipcoacing.com.au), we expressively collect the following non-personally identifiable information, including but not limited to, browser type, version and language, operating system, pages viewed while browsing the Site, page access times and referring

website address. This collected information is used for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are at this Site.

Corporate Leadership Coaching may use your personal information for the purposes of direct marketing, in a manner that you have consented to and on topics you have indicated you are interested in (by, for example, filling out a form, providing personal information or clicking to subscribe to such information). We may contact you for the purposes of direct marketing in a number of ways, including telephone, post, email or via social media (eg. Facebook, twitter). We will not provide your personal information to other third parties for the purposes of direct marketing without your consent. You can update your preferences for direct marketing at any time by contacting us at helen@corporateleadershipcoaching.com.au. Sensitive information will not be used for the purpose of direct marketing.

From time to time, we may use client information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at some time in the future we will use for these new purposes only, data collected from the time of the policy change forward will adhere to our updated practices.

Correction: If you believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us. We rely in part upon customers advising us when their personal information changes. We will endeavour to promptly correct any information found to be inaccurate, incomplete or out of date

5. Storing your personal or sensitive information

Corporate Leadership Coaching may store your personal or sensitive information via electronic means (files, portable storage devices, databases, documents, emails, social media accounts), paper files (stored in drawers and cabinets – locked where necessary). Files may also be held offsite in secure archive or storage facilities. Once we do receive your transmission, we will make our best efforts to ensure its security on our systems.

We also require our employees and data processors to respect the confidentiality of any personal information held by us.

No data transmission over the internet can be guaranteed to be 100 per cent secure. As a result, while we strive to protect user's personal information, we cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk.

6. Complaints about breach

If you believe that we have breached the Australian Privacy Principles and wish to make a complaint about that breach, please contact us on the email address below.

7. Unsubscribe

To unsubscribe from our e-mail database, or opt out of communications, please contact us at the details below.

8. Storage and Security

We are committed to ensuring that the information you provide is secure and it may be backed up or stored on a cloud system.

9. Changes to this Privacy Policy

Corporate Leadership Coaching reserves the right to make amendments to this Privacy Policy at any time. As a result, please remember to refer back to this Privacy Policy regularly to review any amendments.

10. Accessing your personal or sensitive information

You have a right to access your personal or sensitive information, subject to exceptions allowed by law. If you would like to do so, please let us know. You may be required to put your request in writing. Corporate Leadership Coaching reserves the right to charge a fee for searching for, and providing access to, your information on a case by case basis.

11. Acceptance

You accept that your use of this Website and our Services includes your acceptance of this Privacy Policy in addition to any of our other applicable terms and conditions.

For any questions or notice, please contact us at:

Corporate Leadership Coaching

Email: helen@corporateleadershipcoaching.com.au