



A D A P T I V E

CHANGE MINDSET

Adaptive Change Mindset Pty Ltd Privacy Policy

Adaptive Change Mindset Pty Ltd (“**we**”, “**us**” or “**our**”) are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store, share and disclose your personal information.

1 Openness and transparency

We are committed to protecting your privacy and respecting and upholding your rights under the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth) (**Privacy Act**). We ensure that we will take all necessary and reasonable steps to comply with the APPs and to deal with inquiries or complaints from individuals about compliance with the APPs.

By accessing and using our website, products and services, you agree to and consent to the collection, use, storage and disclosure of personal information by us as set out in this Privacy Policy.

2 Personal information

Personal information is information or an opinion about an individual whose identity is apparent, or can be reasonably ascertained, from that information or opinion (whether true or not, and whether recorded in a material form or not).

The type of personal information we collect from you includes, without limitation, the following:

- your full name;
- address;
- email address;
- telephone number(s);
- date of birth;
- credit card information;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information;
- information you provide to us through customer surveys;
- billing information (including credit and bank details); or
- any other personal information that may be required in order to facilitate your dealings with us.

3 Collection

We will collect personal information only by lawful and fair means and not in an unreasonably intrusive way. Generally, we will collect personal information directly from you, and only to the extent necessary to provide our products and services requested or ordered by you and to carry out our administrative functions or as required by law.



We may also collect personal information from you when you fill in an application form, communicate with us, visit our website, provide us with feedback, complete online surveys or participate in competitions. We may collect personal information about you from our business partners or from third parties.

If you use a pseudonym when dealing with us or you do not provide identifiable information to us, we may not be able to provide you with any or all of our services as requested. If you wish to remain anonymous when you use our website, do not sign into it or provide any information that might identify you.

We require individuals to provide accurate, up-to-date and complete personal information at the time it is collected.

4 What do we do with your personal information?

We use and disclose your personal information for the purposes for which the information is collected, or for a directly related purpose, including (but not limited to):

- providing our website, products and services to you;
- administering, protecting, improving or optimising our website, products and services (including performing data analytics, conducting research and for advertising and marketing purposes);
- informing you about our website, products, services, rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- responding to any inquiries or comments that you submit to us;
- verifying your identity;
- any other purpose you have consented to; and
- any use which is required or authorised by law.

5 Disclosure of personal information

We may disclose your personal information to:

- third-parties we ordinarily engage from time to time to perform functions on our behalf for the above purposes;
- any person or entity to whom you have consented to us disclosing your personal information to;
- our external business advisors, auditors, lawyers, insurers and financiers; and
- any person or entity to whom we are required or authorised to disclose your personal information to in accordance with the law.

6 Access and management

Subject to some exceptions provided by law, you may request access to your personal information in our customer account database, or seek correction of it, by contacting us. See section 10: Contact information. Should we decline you access to your personal information, we will provide a written explanation setting out our reasons for doing so.

We may charge a reasonable fee that is not excessive to cover the charges of retrieving your personal information from our customer account database. We will not charge you for making the request.

If you believe that we hold personal information about you that is not accurate, complete or up-to-date then you may request that your personal information be amended. We will respond to your request to correct your personal information within a reasonable timeframe and you will not be charged a fee for correcting your personal information.

If we no longer need your personal information for any of the purposes set out in this Privacy Policy, or as otherwise required by law, we will take such steps as are reasonable in the circumstances to destroy your personal information or to de-identify it.

7 Direct marketing



Where we have your express or implied consent, or where we are otherwise permitted by law, we may use your personal information to send you information about products and services we believe are suited to you and your interests or we may invite you to attend special events.

At any time you may opt out of receiving direct marketing communications from us. Unless you opt-out, your consent to receive direct marketing communications from us and to the handling of your personal information as detailed above will continue. You can opt-out by following the unsubscribe instructions included in the relevant marketing communication, or by contacting us in writing at chat@adaptivechangemindset.com

8 Adaptive Change Mindset website

When transmitting personal information from your computer to the Adaptive Change Mindset website, you must keep in mind that the transmission of information over the internet is not always completely secure or error-free. Other than liability that cannot lawfully be excluded, we will not be liable in any way in relation to any breach of security or any unintended loss or disclosure of that information.

The Adaptive Change Mindset website may use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but if you do so, you may not be able to fully experience the interactive features of the Adaptive Change Mindset website.

9 Security

We may hold your personal information in either electronic or hard copy. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. For example, we use encryption software.

However, we cannot guarantee the security of any personal information transmitted over the internet and therefore you disclose information to us at your own risk. We will not be liable for any unauthorised access, modification or disclosure, or misuse of your personal information.

10 Contact information

If you require further information regarding our Privacy Policy or wish to make a privacy complaint, please contact us at chat@adaptivechangemindset.com or call us on: 0410 314 641 or 0402 814 902.

Miscellaneous

We reserve the right to modify this Privacy Policy in whole or in part from time to time without notice and amendments will be effective immediately upon posting of the amended Privacy Policy on the Adaptive Change Mindset website.

Dated: 12 August 2019