

PRIVACY POLICY

Version 3.0 – Last Update 03/10/2018

1. Application of this Privacy Policy

NúmeroPro Pty Ltd ATF The Kidsoft Unit Trust ABN 17 349 353 404 ("NúmeroPro" / "we" / "us" / "our") understands and respects the importance of your privacy and is committed to safeguarding your personal information.

NúmeroPro is bound by and committed to complying with the requirements of the Privacy Act 1988 ("Act") as amended from time to time, which includes obligations under the Notifiable Data Breach ("NDB") Scheme introduced in February 2018. The Act regulates how public agencies and certain private organisations can collect, hold, use and disclose personal information, and how you can access and correct that personal information. The Act applies only to information about individuals, not to information about corporate entities such as businesses, firms or trusts.

This Privacy Policy sets out how NúmeroPro complies with the Act. This Privacy Policy also addresses how we collect, hold, use and disclose your personal information, including any financial information that you provide to NúmeroPro.

By accessing and/or using our website and/or our services, you consent to the terms of this Privacy Policy and agree to be bound by it.

If we do not receive personal information about you this Privacy Policy will not apply.

2. Collection of personal information

'Personal information' is information in any form that can identify a living person.

Personal information may be collected directly by NúmeroPro from you (or your representative), or via a third party. In most situations, NúmeroPro collects personal information about an individual from the NúmeroPro client who is employing the individual, or from the NúmeroPro client where the parent/guardian has a child enrolled in the child care centre. Where NúmeroPro is provided with personal information by its clients, NúmeroPro relies on its clients having obtained the consent of the individual for the collection, use, and disclosure of his or her personal information to and by NúmeroPro.

NúmeroPro may also collect your information when you:

- visit and/or register on any of our websites;
- use our services or software;
- post to our Forum, blogs or on any of our social media platforms including; and
- contact our support team.

NúmeroPro will not ask you for any personal information which we do not need. The Act requires that we should collect information for a purpose that is reasonably necessary for, or directly related to our activities and operations.

3. Kinds of personal information collected and held

NúmeroPro collects only the information necessary to provide its services. NúmeroPro carries out Privacy Impact Assessments in relation to its projects to determine and manage the privacy impacts of each project and to ensure it only collects the necessary personal information for the project.

NúmeroPro generally collects and holds the following types of personal information (which will vary depending on the context of the collection):

- name, address and contact details (for example email, phone and fax) – including for parents/guardians and their child(ren);

- information about identity (for example date of birth) – including for parents/guardians and their child(ren);
- government identifiers (for example Customer Reference Number) – including for parents/guardians and their child(ren);
- information about financial affairs (for example banking details, payment details) – including for parents/guardians and their child(ren).

On occasions, a range of sensitive information may also be collected or held about you, for example information about:

- your health (which may include information about your medical history, immunisations, allergies, special needs, disabilities or injuries) – including for parents/guardians and their child(ren);
- any applicable court order you may have; and
- your ethnic or racial origin.

Where you provide sensitive information to us, you consent to us using that sensitive information for the purpose for which it was collected.

4. Purposes for which personal information is collected and held

NúmeroPro collects and uses personal information for a number of different purposes relating to its activities and services, including:

- billing and account management;
- for administering our services and or software;
- for internal business operations such as planning, product development, training, research, and reporting to NúmeroPro-related entities;
- advising clients of functions and product launches;
- providing direct market offers for products and services provided by or on behalf of NúmeroPro (or other organisations), which NúmeroPro considers to be of interest to its clients;
- to communicate with you and to notify you of any new or changed services;

NúmeroPro uses and discloses personal information for the primary purpose for which it is collected. We will only use your personal information for secondary purposes where we are able to do so in accordance with the Act.

By accessing our services or software, you consent to the collection of your personal information and for your information to be held and used in accordance with this Privacy Policy or otherwise authorised/limited by you.

5. Collection and storage of personal information

NúmeroPro collects personal information through a number of different methods, including:

- meetings;
- telephone and facsimile communications;
- email communications;
- electronic and paper-based forms;
- websites;
- Kidsoft suite of software applications.

NúmeroPro stores personal information in electronic and paper-based records.

6. Protection of personal information

NúmeroPro exercises great care to protect personal information that it holds. This includes, among other things, using industry-standard techniques such as firewalls, encryption, intrusion detection, and site monitoring.

Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, while NúmeroPro strives to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or receive from us. This is especially true for information you transmit to us via e-mail or through the Kidsoft suite of software applications. We have no way of protecting that information until it reaches us. Once we receive your email transmission or communication transmission via the Kidsoft suite of software applications, we make our best effort to ensure its security on our servers. If this is of concern to you then you may use other methods of communication with NúmeroPro, for example post, phone or fax (although these methods of communication also have risks associated with them).

NúmeroPro confirms that, in line with its obligations under the NDB Scheme, it has procedures in place should the confidentiality or security of your personal information be compromised. We confirm that we will advise you at the first reasonable opportunity following discovery of a security breach that is likely to cause serious harm, where your information is lost, stolen, accessed, used, disclosed, copied, modified or disposed of by an unauthorised person or in any unauthorised manner.

Internally, NúmeroPro restricts access to personal information to employees or parties who need access to the personal information in order to do their jobs. These employees or parties are limited in number and are committed to our Privacy Policy and compliance with the Act.

Additionally, NúmeroPro will never ask you for your password in an unsolicited phone call or in an unsolicited e-mail or communication via the Kidsoft suite of software applications.

NúmeroPro will review its security arrangements from time to time as it deems appropriate.

7. Disclosure of personal information

NúmeroPro does not sell or rent personal information to anyone.

However, in using personal information, it may be necessary for NúmeroPro to disclose personal information to various organisations and/or parties, such as the Australian Taxation Office, banking/financial institutions, superannuation authorities, health insurance organisations, contracted service providers, business partners, and related companies of NúmeroPro.

NúmeroPro may also disclose personal information in special cases when NúmeroPro believes, in good faith, that such action is reasonably necessary, for example:

- to conform to legal requirements or comply with legal process;
- to protect and defend NúmeroPro's rights or property;
- to enforce NúmeroPro's contractual arrangements; or
- to protect the interests of NúmeroPro's clients or others.

NúmeroPro will take seriously any unauthorised or accidental disclosure of personal information.

8. Disclosure of personal information overseas

NúmeroPro holds your personal information on servers located primarily in Australia.

In providing our services to you, it may be necessary for NúmeroPro to, on occasion, disclose your personal information to overseas recipients. An example of a situation in which we may transfer personal information overseas is the provision of personal information to recipients using a web-based email account where data is stored on an overseas server. Where your personal information is disclosed to an overseas recipient, NúmeroPro takes care and caution to ensure that the recipient takes the security and confidentiality of your personal information as seriously as it does.

It is not practicable to list every country to which NumeroPro may provide personal information as this will vary depending on the circumstances. If you wish to find out which countries, if any, your personal information has been given to please contact NumeroPro using the contact details set out in section 14 of this Privacy Policy.

9. Website

NumeroPro will generally only collect personal information from its website where a person chooses to provide that information.

If you visit our website to download or read information, then we may record technical information (for example your IP or server address, the time and date of your visit, and your general locality) which does not reveal your identity. This information is used for monitoring and development purposes. NumeroPro will not make any attempt to identify you in these circumstances, other than in exceptional circumstances, for example an investigation into the improper use of the website.

Some functionality of our website is run by third parties, for example Google, Twitter, Facebook, LinkedIn and YouTube, Freshdesk, who may capture and store your personal information, including outside of Australia. Those third parties may not be subject to the Act. NumeroPro is not responsible for the privacy policies of third parties. We encourage you to examine each website's privacy policies and make your own decisions.

Our website may contain links to other websites. NumeroPro is not responsible for the content or the privacy policies of external websites.

10. Cookies

Some NumeroPro sites, like many other commercial websites, may utilise a standard technology called "cookies" to collect information about how our site is used. Cookies were designed to help a web site operator determine that a particular user had visited the site previously and thus save and remember any preferences that may have been set while the user was browsing the site. Cookies are small strings of text that websites can send to your browser. Cookies cannot retrieve any other data from your hard drive or obtain your e-mail address. If you are browsing a NumeroPro informational site, a cookie may be used to identify your browser as one that has visited the site before.

We may also make use of memory-based cookies in support of authenticating the user of certain NumeroPro web applications. Similarly, if you are a registered user of a site providing service to NumeroPro's clients (and have a user ID and password), we may use cookies so that we can provide personalised information based on preferences you have indicated while using the site. You have the ability to modify your browser to either accept all cookies, notify you when a cookie is sent, or reject all cookies. However, if you reject cookies you may not be able to utilise NumeroPro services that require registration.

11. How to correct, access and update your personal information

You have a right under the Act to:

- access personal information we hold about you; and
- request corrections to any personal information that we hold about you if you think the information is out-of-date, inaccurate, incomplete, irrelevant or misleading.

However, as set out under the Act, it may be necessary for us to deny your request, for example if the request impacted on the privacy or affairs of others, or if it is not reasonable and practicable for us to process your request in the manner you have requested. In this event, we will provide you with the reasons for such denial.

To access or seek correction of your personal information please contact NumeroPro using the contact details set out in section 14 of this Privacy Policy.

12. Opt-Out

You have the right to opt-out of receiving communication from us or to withdraw your consent to the collection and use of your personal information at any time. If you wish to opt-out or withdraw your consent, please contact NumeroPro using the contact details set out in section 14 of this Privacy Policy.

13. Complaints

If you believe we may have breached your privacy rights, you may contact NumeroPro using the contact details set out in section 14 of this Privacy Policy.

NumeroPro is committed to achieving a speedy and fair resolution of any complaints and will ensure that your complaint is taken seriously. We will respond to your complaint or request promptly if you provide your contact details to us.

NumeroPro expects that its procedures will result in a fair and prompt dealing with your complaint, However, if you remain dissatisfied and are concerned that we have not complied with your legal rights or applicable privacy laws, you may make a formal complaint with the Office of the Australian Information Commissioner.

14. How to contact us

If you wish to:

- ask questions about this Privacy Policy;
- seek correction of or obtain access to your personal information;
- ask about how your personal information is collected, used, held or disclosed; or
- make a complaint about a breach of your privacy,

please contact NumeroPro's Privacy Officer using the following contact details:

- helpdesk@kidsoft.com.au
- Privacy Officer, PO Box 1298, Broadbeach QLD 4218.

15. Changes to our Privacy Policy

From time to time it may be necessary for us to review and revise this Privacy Policy. We reserve the right to change this Privacy Policy at any time. We may notify you about changes to this Privacy Policy by posting an updated version on our website.

16. Availability of this Privacy Policy

If you wish to access this Privacy Policy in an alternate form, for example hard-copy, please contact NumeroPro using the contact details set out in section 14 of this Privacy Policy.