

# Privacy Policy

## 1. Acknowledgement and acceptance of policy

People Fluent Group Pty Ltd is committed to maintaining the privacy, accuracy and security of your personal information.

Protecting your privacy and keeping information secure is a priority for us. We respect the privacy of our clients, participants, co-workers, volunteers, visitors, staff, contractors and suppliers. Information provided to us is for the purposes of facilitating access to (including enrolment) and participation in meetings, our classes, workshops, (face to face and online) and any other events, as well as COVID compliance requirements.

This Privacy Statement outlines the privacy practices we undertake with the information collected when you interact with our website, social media, at training/workshops (e.g. completion of registration, assessments, feedback forms) or by other means. By accessing <http://peoplefluent.com.au>, Facebook, LinkedIn, Instagram and any other social media we may use, or attending training, workshops and meetings you acknowledge and fully understand this Privacy Statement and freely consent to the information collection and use described in this Privacy Statement.

## 2. Why we collect

We collect personal information from clients, participants, co-workers, staff, contractors, volunteers, visitors and suppliers...

- So that we may manage and provide services to you, as well as maintain the quality and currency of these services
- In order to comply with COVID reporting requirements
- In order to satisfy our State and Commonwealth legal obligations
- In order to improve or diversify the services provided to you
- To provide you with additional or alternate services provided by People Fluent Group Pty Ltd.

## 3. How we collect information and use it

- We collect certain information from and about our users and students four ways...
- Directly from our web server logs, e.g. newsletter sign up, viewing online learning materials, emailing us or using the Contact Us form
- Cookies, and
- Directly from social media, e.g. Facebook, LinkedIn, Instagram
- Directly from the user, including via surveys and questionnaires, registration slip at the start of class, COVID check-in

#### **4. Personal Information of Users**

Visitors and participants to our classes (face to face and online), website or social media pages may be required to provide information. For example when you complete a registration form in training or workshop, fill out the COVID QR form, log onto an online session, sign up to our newsletter, complete an online form, register online, complete a survey, make a purchase, etc, we will request some personal information such as name, address, email, telephone number, and other relevant information.

We will not disclose personally identifiable information we collect from you to third parties without your permission except to the extent necessary including...

- To fulfil our COVID compliance requirements
- To fulfil your service requests for products or services
- To protect ourselves, our customer, our contractors or our vendors from liability or to defend our rights, including investigations of fraud or misconduct
- To our insurers
- To third parties who have agreed in writing to maintain such information in confidence and use such information solely in performance of services to us
- To respond to legal process or comply with law, including subpoenas
- To entities under common ownership or control with us or to our owners, or
- In connection with a merger, acquisition, or liquidation of the business.

If after you opt-in or after having not initially taken an opportunity to opt-out, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at [hello@peoplefluent.com.au](mailto:hello@peoplefluent.com.au)

#### **5. How we store personal information**

Information may be stored in hard copy (printed documents), as soft copy (electronic storage), which may be on a computer, laptop, tablet, external hard disk, or cloud storage.

#### **6. How we protect information**

We endeavour to protect your information from unauthorised access, misuse, or loss. Protections include...

- Key locks for storage of hard copy documents.
- Security log-ons to computers (laptops) and cloud storage – log-in and passwords
- Access to database is only available to those who require such access
- Key locks for storage of external hard disks
- Anti-virus and anti-malware systems on computers, laptops and tablet
- Secure business premise/office.

Also all staff, contractors and volunteers are bound by confidentiality requirements regarding company and personal information

We use reasonable procedures to protect the personal information that we collect from you against loss, theft and misuse, as well as unauthorised access, disclosure, alteration and destruction.

We cannot guarantee the security of our databases or the security during transmission to us of the information you supply over the Internet.

You can help us by taking precautions to protect your personal information when you are on the Internet and only disclose information that you want made public. Also make sure to use a secure web browser.

## **7. Transfer of personal information**

For the purposes set out in this Privacy Policy, personal information may be transferred to, processed, stored and accessed by us, our affiliates and third parties in Australia and in other jurisdictions where we or they operate. Courts and other authorities in these jurisdictions may, in certain circumstances, be entitled to access your personal information.

By using the website, you consent to this transfer, processing, storage and access of your personal information in and/or outside of the jurisdiction in which you reside.

## **8. Record destruction**

We use secure methods to destroy or de-identify personal information in a manner the law permits.

For paper information this is done by shredding paper documents using a registered shredding firm that specialises in confidential information shredding and provides a confirmation certificate once done.

## **9. Privacy and marketing**

People Fluent Group Pty Ltd will from time-to-time, send mail and/or email to students and past students for the purpose of updates, information sharing and/or marketing. Students may at any time request that all such mail and email cease. All requests will be promptly complied with.

People Fluent Group Pty Ltd will from time-to-time contact clients, participants and others by other means such as surveys, post and telephone for related research and/or marketing activities. Clients, participants and others who request so will be removed from any marketing lists.

## **10. Disclosure of personal information**

People Fluent Group Pty Ltd takes all steps to ensure that the personal details of its clients, participants, staff, contractors, volunteers and suppliers are not released to un-authorised persons or organisations.

Information required for COVID compliance may be shared with the venue's nominated COVID compliance contact person, and the Department of Health.

Otherwise, unless compelled by law, People Fluent Group Pty Ltd will not disclose your Personal Information to an external third party without your consent.

No personal information is ever or will ever be sold.

## **11. Technology stuff**

People Fluent Group Pty Ltd website automatically collects a certain amount of personal information about you when you are browsing or otherwise using its website/s. We use the data collected for statistical and business purposes such as diagnosing a fault and improving our services. Any information collected by People Fluent Group Pty Ltd through automated mechanisms does not identify individuals and will only be used for the purpose for which it was collected in accord with this Privacy Statement.

The data is not accessible except to authorised staff. Information which is automatically collected may be published as aggregated (de-identified) information to assist with improving our services.

### **a. Web Server Logs**

When you visit our website, we may track information to administer the site and analyse its usage. Examples of information we may track include:

- Your Internet protocol address
- The kind of browser or computer you use
- Number of links you click within the site
- State or country from which you accessed the site
- Date and time of your visit
- Name of your Internet service provider
- Pages you viewed on the site.

### **b. Use of Cookies**

We may use cookies to personalise or enhance your user experience. A cookie is a small text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. For example, if you personalise a web page, or navigate within a site, a cookie helps the site to recall your specific information on subsequent visits. Hence, this simplifies the process of delivering relevant content and eases site navigation by providing and saving your preferences and login information as well as providing personalised functionality.

You can accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you reject cookies by changing your browser settings, this may disable some of the functionality on our website.

### **c. Use of web beacons or GIF files**

The business web pages may contain electronic images known as web beacons – sometimes also called single-pixel gifs – that allow Company to count users who have visited those pages and to deliver co-branded services.

The business may include Web beacons in promotional e-mail messages or newsletters in order to determine whether messages have been opened and acted upon. Some of these web beacons may be placed by third party service providers to help determine the effectiveness of our advertising campaigns or email communications. These web beacons may be used by these service providers to place a persistent cookie on your computer. This allows the service provider to recognize your computer each time you visit certain pages or emails and compile anonymous information in relation to those page views, which in turn enables us and our service providers to learn which advertisements and emails bring you to our website and how you use the site. The business prohibits web beacons from being used to collect or access your personal information.

### **d. Third party hosting**

A third party, not a member of People Fluent Group Pty Ltd, hosts our web site. Each time a person visits our website, statistical data may be collected. This data, if collected, is not linked to a particular person and does not provide us with any personal or sensitive information.

The same applies to the third party who hosts our emails.

#### **e. Do not track**

We have not implemented any technology that would effectively recognize do-not-track signals and note that some content available on our Site is made available through relationships with third party providers who we do not control and who may have collect and/or disclose personally identifiable information.

#### **12. How to correct, update or delete your information**

If you would like to access, correct, amend or delete any personally identifiable information we store about you, register a complaint, or simply want more information, contact us at [hello@peoplefluent.com.au](mailto:hello@peoplefluent.com.au).

#### **13. Changes to this statement**

We have the discretion to update this privacy statement. We encourage you to periodically review this privacy statement to stay informed about how we are helping to protect the personal information we collect. Your continued use of the service constitutes your agreement to this privacy statement and any updates.

If we update this policy we will also update the modification date. This policy was last modified on 1st November 2020.

#### **14. Contacting us**

If you have questions regarding our Privacy Policy please contact us at [hello@peoplefluent.com.au](mailto:hello@peoplefluent.com.au)