



## PRIVACY POLICY

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Nurch Pty Ltd ACN 628 836 331 (**we, our, us**) recognises the importance of your privacy and understands your concerns about the security of the personal information provided to us.

This Privacy Policy has been developed in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), including the *Australian Privacy Principles (APPs)*. The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

**Personal information** is information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

**Sensitive information**, a sub-set of personal information, is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information.

**Health information**, regarded as one of the most sensitive types of personal information, is information or an opinion about an individual that involves assessing, maintaining or improving a person's physical or psychological health, where a person's health cannot be maintained or improved – managing the person's physical or psychological health, diagnosing or treating a person's illness, disability or injury, recording a person's physical or psychological health for the purposes of assessing, maintaining, improving or managing the person's health, or dispensing a prescription drug or medicinal preparation by a pharmacist.

This Privacy Policy details how we manage personal information about you.

### **What personal information we collect and hold**

We have taken steps to deliberately minimise the amount of personal information that we collect from you. The kinds of personal information we collect from you or about you depend on the transaction you have entered into with us and may include:

- your name;
- your residential postcode;
- your residential or postal address;
- your contact details such as telephone numbers and e-mail addresses; and
- the number of and first names of your children;

- the day and month of birth of your children. We do not collect the year your children were born.

Generally, we do not collect sensitive or health information. However, we may collect sensitive or health information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. In all other situations, we will specifically seek your consent.

If we do not collect, hold, use or disclose your personal information, or if you do not provide your consent, then we may not be able to answer your enquiry or provide the goods that you or your organisation have contracted us to provide.

### **How we collect and hold personal information**

Whilst our preference is to collect personal information only directly from you, it is often unreasonable or impracticable for us to do so. If we do collect personal information directly from you, it may be collected from you through telephone calls, your emails and other correspondence to us or our employees through our website or online portal.

We do collect personal information about you from third parties who are affiliated with our business, such as participating sponsor child care providers (**Sponsor Centre**). This will occur, for example, when you wish to gain access to the Nurch Childcare Loyalty Rewards Program (**System**) and the participating Sponsor Centre inputs your personal information into the System. We direct and require each Sponsor Centre to obtain your express consent prior to uploading your Personal Information to the System.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

### **Cookies**

When you visit our website, a small data file called a cookie may be placed on your computer. The purpose of a cookie is to assist us in analysing web traffic by recording information about the pages people visit, so that we know what preferences people have in our store and what they find interesting and useful.

You may be able to set your computer so that cookies are deleted or refused, however this action could impede the functionality of our website. In particular you may not be able to store your preferences, and some of our pages might not display properly. If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

### **Why we collect, hold, use and disclose personal information**

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions, activities and services. These primarily relate to the operation of the System.

For example, we collect, hold, use and disclose your personal information as necessary to provide our services, for our administration and accounting purposes associated with providing these services, for statistical and data collection purposes, for providing you with information about other services offered by us, for marketing and promotions, and for market

research communications. We collect, hold, use and disclose your personal information for purposes associated with your participation in the System.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent, unless it could be reasonably expected that we would use your information for a related purpose.

Where we use your personal information for marketing and promotional communications, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

We may also disclose your personal information to third parties (including government departments and enforcement bodies) where required or permitted by law.

### **How we hold, store and keep secure your personal information**

Your personal information is held primarily by electronic means but may be stored on paper, or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and unauthorised access, modification and disclosure. Our staff members receive periodic training on privacy procedures.

When you provide us with your personal information, it is stored in a secure environment that is accessible only by authorised staff.

### **Overseas disclosure**

We will not disclose your personal information overseas.

### **Destruction and de-identification**

We will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose. We will take reasonable steps and use secure methods to destroy or de-identify personal information that is no longer required for any purpose for which the personal information may be used under this Policy in accordance with the Privacy Act.

### **Requests for access and correction**

We will take reasonable steps to ensure that the personal information we use or disclose is accurate, complete and up to date, having regard to the purpose of the use or disclosure.

We rely on the personal information we hold about you to efficiently provide our services. For this reason, it is very important that the personal information we collect from you is accurate, complete and up-to-date. To assist us to keep our records up-to-date, please update your details via the System online portal or notify us at [privacyofficer@nurch.com.au](mailto:privacyofficer@nurch.com.au) of any changes to your personal information.

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you. In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons for our decision.

### **Data Breaches**

In Australia, if we suspect that a data breach has occurred, we will undertake an assessment into the circumstances of the suspected breach within 30 days after the suspected breach has occurred. Where it is ascertained that a breach has actually occurred and where required by law, we will notify the Privacy Commissioner and affected individuals as soon as practicable after becoming aware that a data breach has occurred.

### **Complaints and concerns**

We have procedures in place for dealing with your complaints and concerns about our practices in relation to the Privacy Act, and any alleged breach of this Policy. We will respond to your complaint in accordance with the relevant provisions of the Privacy Act.

Our Privacy Officer can be contacted to discuss or attempt to resolve any complaints relating to the collection, storage and use of your personal information. For further information, please contact our Privacy Officer at [privacyofficer@nurch.com.au](mailto:privacyofficer@nurch.com.au).

### **Changes to this Privacy Statement**

It may be necessary for us to review and revise our Privacy Policy from time to time. An amended version will be posted on our website at [www.nurch.com.au](http://www.nurch.com.au). We suggest that you visit our website regularly to keep up to date with any changes.

### **How to Contact Us**

Should you have other questions or concerns about our Privacy Policy, please send us an email to [privacyofficer@nurch.com.au](mailto:privacyofficer@nurch.com.au) or to write to us at:

Privacy Officer  
Nurch Pty Ltd  
Level 2, 395 Hamilton Road  
Chermside QLD 4034 QLD  
Email: [complaints@nurch.com.au](mailto:complaints@nurch.com.au)

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