



Privacy Policy

This Privacy Policy applies to the operations of Think Childcare Limited (“**Company**” and, together with its controlled entities, the “**Group**”) within Australia, and explains how we manage personal information. We safeguard your privacy and the confidentiality of personal information collected by us in the course of our business, including information provided to us by third parties, and are bound by the Australian Privacy Principles which are set out in the *Privacy Act 1988* (Cth) (the **Act**).

The Group is committed to the protection of personal information in accordance with these privacy laws in the provision of its childcare services through the childcare centres it operates and manages.

This Privacy Policy explains how we collect, hold, use, disclose, secure and otherwise manage the personal information of the families that use our services. It describes the types of information we collect and hold and why, how to access and correct the information and how to make a privacy complaint.

Kinds of personal information we collect and hold

Personal information is any information or an opinion about you, or which could reasonably be used to identify you. Personal information we may collect from you includes:

- your name, address, date of birth and contact details;
- information relating to children enrolled in our centres and their families, including information about health, education and financial information, for example information relating to funding support from the government;
- enrolment history and details of attendance, services used and any information relating to attendance at our centres or use of our services;
- information collected by us when you apply to enrol your child at our centres; and
- if you apply to work for us, your past employment, qualifications, residency status and proof of identity.

Sources of personal information

In most cases we will collect personal information directly from you. We will obtain your consent to collect sensitive information, such as information about your health or eligibility for financial support, unless we are required or permitted by law to collect it without your consent.

When dealing with the Group you may be:

- enrolled at one of our childcare centres or a parent of a child enrolled at one of our centres, or who is applying to enrol your child;
- a former user of our centres, or a client or customer of a business partner, including an externally owned childcare centre managed by us;



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- a participant in any promotion run by us, or who has provided information in connection with an inquiry about us or our business, or in connection with a marketing initiative we conduct;
- a supplier, employee, or other person required to undertake accreditation or achieve any clearance or approval in order to deal with us or be involve in any way with our business; or
- an applicant for employment, through our recruitment services provider.

Where relevant, a reference to our childcare centres includes a reference to externally owned childcare centres managed by us.

You may choose not to provide your personal information

If you choose not to provide your personal information we may not be able to provide you with childcare services, process your application or allow you to participate in training, recruitment programmes, marketing initiatives or information campaigns.

How personal information is collected and held

We may collect your personal information if you use any online services we provide (including recording your payment information such as credit card or bank account details); complete our documents or forms, including in relation to an enrolment application; speak to one of our contact centres; participate in an information or marketing initiative; deal with any of our business partners, or if you apply to work with us.

Your personal information is recorded in our computer systems, databases and paper records and held in secure environments. We may utilise our related bodies corporate, agents and third party suppliers for data storage services.

Any personal information you provide over the internet is held securely. We use service providers and secure online payment facilities so that you can pay us by credit card. Your details cannot be accessed through the internet after your payment has been processed.

How we collect information through our websites

The Company has its own website (www.thinkchildcare.com.au). There are a number of ways in which we collect information through our website.

- **Analytics:** We use Google Analytics (hosted by a third party) to collect data about your interaction with our website. The sole purpose of collecting your data in this way is to improve your experience when using our site. The types of data we collect with these tools include: your device's IP address, device screen size, device type, operating system and browser information, geographic location, referring domain and out link if applicable, search terms and pages visited and date and time when website pages were accessed.
- **Cookies:** Cookies are small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the website.
- **Email lists, registrations and feedback:** We will collect information that you provide to us when signing up to mailing lists and registering for our events, or when submitting feedback on your experience with our website.
- To collect voluntary feedback on your experience with our website.



Anonymity

There are limited circumstances where you may be able to deal with us anonymously or by using a pseudonym if you request to do so. Examples include where you are seeking only general information about one of our products or services, or are looking only for indicative pricing. In most cases it will not be possible for you to deal with us in this way, or to commence or complete an enrolment application in this way.

Purposes for collecting, holding, using and disclosing personal information

We only collect personal information where it is reasonably necessary for one or more of our functions or activities, such as issuing, administering and managing our business or supplying our services, assessing your eligibility for funding support or other benefits, or assessing your suitability to work with us.

How we use and disclose your personal information

We will only use or disclose your personal information in ways that you would reasonably expect, including so that we can provide our services to you or provide you with information, provide you with online services or information or allow you to use our recruitment facilities. We will request your consent for any other purpose which you would not reasonably expect.

Who we may disclose your personal information to and why

We, or our authorised agent, may disclose your personal information to:

- any person authorised by you;
- our related bodies corporate that provide childcare services or support our business through marketing, accounting and administration services;
- a mail house, records management company or technology services provider (for printing and/or delivery of mail and email, including secure storage and management of our records);
- a number of service providers engaged by the Group from time to time in connection with the provision of our services or the health and care of children enrolled at the childcare centres we manage (including but not limited to, health service providers, insurers and government authorities, service providers that host our website servers or manage our Information Technology and our human resources information);
- an organisation that provides you with banking facilities (for the purpose of arranging direct debit or other payment transactions or confirming payments made by you to us);
- persons employed by or who have an interest in externally-owned childcare centres managed by us; and
- any company who conducts surveys on our behalf for the purpose of improving or providing our services.

Personal information about you may also be collected from the above people or organisations.

Disclosure to overseas recipients

In some instances our suppliers, service providers and related bodies corporate we disclose your personal information to may be located overseas. Where personal information has been disclosed to an overseas recipient, there is a possibility that in certain cases that recipient may be required to disclose it under a foreign law. Where this occurs, such disclosure is not a breach of the Act.



Social Networking

We use social networking services such as Facebook to communicate with the public about the Group and the work we do. When you communicate with us using these services we may collect your personal information. The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for Facebook on their websites.

Data Breach Notifications

If you notify the Company of a data breach, we will not disclose personal information about you unless you agree, would reasonably expect us to do so in the circumstances, or if we are required to do so by law.

Accessing and seeking correction of your personal information

Our aim is to always have accurate, complete, up-to-date and relevant personal information. When you receive enrolment or re-enrolment notices, general correspondence or if we speak with you, you should check that the information we hold about you is correct.

You may request access to your personal information that we hold at any time, and request us to correct any errors in that information. This request must be in writing and delivered to the Company. We will endeavour to respond to your request within 30 days of receiving your request. Prior to granting access to or amending your information, we may ask that you verify your identity.

If we do not grant you access to your information or we do not correct your information, we may notify you in writing setting out the reasons why we did not action your request. If we do amend your personal information, you may request us to advise any other third parties whom we have disclosed your information to. Generally no restrictions or charges will apply.

How to make a complaint

If you wish to make a complaint about how we have handled your personal information you should make that complaint in writing. If you require any assistance, you may contact us.

If we receive a complaint from you about how we have handled your personal information, we will determine if any action should be taken to resolve the complaint. If we decide that a complaint should be investigated further, the complaint will usually be handled by a more senior employee of the Company.

We will endeavour to respond to your complaint within 30 days of receiving your complaint.

If you are not satisfied with our response you may ask for a review by a more senior officer of the Company.



How to contact us

Email	PR@thinkchildcare.com.au
Telephone	(02) 9712 7444
Post	PO Box 465 Drummoyne NSW, 1470

Approved and adopted

This policy was approved and adopted by the Board on 27 March 2015.

This policy was reviewed and approved by the Board on 15 February 2018.