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1. Purpose

Kudos Services is committed to providing quality services to children, youths and their families and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APP's) contained in the *Privacy Act 1988* (Cth) (the Privacy Act). The APP's govern the ways in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from The Office of the Australian Information Commissioner at www.aoic.gov.au.

1.1. Background

- 1.1.1. Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website, from your website, from media and publications, from other publicly available sources, and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you and providing information to our clients. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing list at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

- 1.1.2. Sensitive Information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law

- 1.1.3. Definitions

Collects – an entity **collects** personal information only if the entity collects the personal information for inclusion in a record or generally available publication.

Consent – means express or implied consent



De-identified – personal information is **de-identified** if the information is no longer about an identifiable individual or an individual who is reasonably identifiable.

Generally available publication – means a magazine, book, article, newspaper or other publication that is, or will be, generally available to members of the public:

- (a) Whether or not it is published in print, electronically or in any other form; and
- (b) Whether or not it is available on the payment of a fee.

Holds – an entity **holds** personal information if the entity has possession or control of a record that contains personal information

Personal Information – means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) Whether the information or opinion is true or not; and
- (b) Whether the information or opinion is recorded in a material form or not.

Sensitive information – means:

- (a) Information or an opinion about an individual's:

- (i) Racial or ethnic origin; or
- (ii) Political opinions; or
- (iii) Membership of a political association; or
- (iv) Religious belief or affiliations; or
- (v) Philosophical beliefs; or
- (vi) Membership of a professional or trade association; or
- (vii) Membership of a trade union; or
- (viii) Sexual orientation or practices; or
- (ix) Criminal record;

that is also personal information; or

- (b) Health information about an individual; or
- (c) Genetic information about an individual that is not otherwise health information; or
- (d) Biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) Biometric templates.

Solicits – an entity **solicits** personal information if the entity requests another entity to provide the personal information, or to provide a kind of information in which that personal information is included.

2. Policy Detail

2.1. Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case



we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

2.2. Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

2.3. Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. The online service is hosted in Australia in secure, accredited facilities. To help protect the privacy of data and personal information we collect and hold, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis.

We also train our employees about the importance of confidentiality and maintaining the privacy and security of your information. Access to your Personal Information is restricted to employees who need it to provide services or benefits to you.

Where your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

2.4. Access to your Personal Information

You may access the Personal Information we hold about you and to update and/ or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Kudos Services will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

2.5. Website analytics

To improve your experience on our website, we may use 'cookies'. Cookies are an industry standard and most major websites use them. A cookie is a small text file that our website may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.



Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of other sites. When you go to other websites from here, we advise you to be aware of and read their privacy policy.

3. Maintaining the Quality of your Personal Information

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

4. Policy Updates

This Policy is effective as of 1 October 2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on our website.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgement of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either by mail or email using the addresses you have provided us, or by placing a prominent notice on our website.

5. Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy please contact us at:

Email: contactus@kudoservices.com.au

