

- 1.2 Wherever lawful and practical, you have the option of not identifying yourself (or using a pseudonym) when dealing with us.

2. HOW WE COLLECT PERSONAL INFORMATION:

- 2.1 We collect your personal information in several different ways, including by way of:
- (a) when you voluntarily acquire our Services;
 - (b) personal contact with us at a face-to-face meeting or situation;
 - (c) correspondence, chats, social applications or services, mail, email, or telephone;
 - (d) when you apply for a job, internship, or other work placement with us;
 - (e) when you visit our Website;
 - (f) when you invest in our business or enquire about a potential acquisition of our business.
- 2.2 Where possible, we will collect your Personal Information directly from you. However, where it is not reasonable or practicable to do so, we may and collect information about you from third parties. For example, personal information may be collected from other sources, such as:
- (a) your guardian or responsible person (if under 18); and
 - (b) other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services;
 - (c) public sources,
 - (d) third-party booking system and payment providers, or
 - (e) our service providers.
- 2.3 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.
- 2.4 If we receive your personal information from third parties, we will protect it as set out in this Privacy Policy.
- 2.5 If you do not provide us with personal information when requested to do so, we may not be able to provide our Services to you, carry out your instructions, or otherwise achieve the purpose for which the information has been sought.
- 2.6 We may hold your personal information in hard copy files and/or electronic files.
- 2.7 We will destroy or de-identify information where we form the opinion that the information has been provided to us unlawfully or unfairly.

3. WHY WE COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION

- 3.1 We will use and disclose your personal information only for the purpose (the “**primary purpose**”) for which you provide it to us, which may include:
- (a) to provide you with any goods or services that you may request including enabling you to access and use the Services from time to time;
 - (b) to contact and communicate with you and otherwise provide customer support;
 - (c) to maintain a database of customers, subscribers or similar;
 - (d) for internal administration and operational purposes such as preventing fraud and abuse of our systems and to troubleshoot bugs;
 - (e) to assist in providing better products and services to you by tailoring the Services to meet your needs;
 - (f) to consider your employment or contractual engagement application;

- (g) to provide you with further information about us or other websites or products or services offered by us or which we consider may be of interest to you;
- (h) to carry out marketing, promotional and publicity activities (including direct marketing), market research and surveys;
- (i) to keep our Website relevant and of interest to users;
- (j) to show you advertising and information that is most relevant to you and your interests;
- (k) to allow us to run our business and perform administrative and operational tasks;
- (l) to comply with legal and regulatory requirements; and
- (m) for any other purpose which is stated to you at the time of collection or that you otherwise authorise.

3.2 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.

3.3 **Sensitive information:** 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.

As noted above, due to the nature of our business, we may collect sensitive personal information from you such as your health information. This 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.

4. **AUTOMATED DECISION MAKING & AI TRANSPARENCY**

If we use automated systems such as Artificial Intelligence (**AI**) or algorithms either now or at any time in the future, we will:

- Inform you when a decision affecting you has been made automatically;
- Provide transparency on the criteria that is used in the automated processes used; and
- Allow you to request human review of an automated decision where legally required or where decisions significantly impact your rights.

5. **COOKIES, WEB BEACONS & GOOGLE ANALYTICS**

While we do not use browsing information to identify you personally, we may use cookies and tracking technologies to collect certain information about your use of our website and enhance user experience.

A cookie is a small file containing a string of characters that is sent to your computer or mobile device when you visit a website. When you visit the website again, the cookie allows that site to recognise your browser. Cookies may store unique identifiers, user preferences and other information. You can reset your browser to refuse or disable all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. While cookies don't tell us your email address, they do allow third parties, like Google and Facebook, to track you as part of re-targeting campaigns (where they are used). If and when you choose to provide our website with personal information, this information may be linked to the data stored in cookies.

Web beacons monitor the behaviour on our website and collect data about your web page viewing.

We also use Google Analytics to collect and process data from time to time.

6. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

6.1 We may disclose your personal information to:

- (a) third party contractors engaged to perform functions or provide services relating to the purposes for which we collect personal information. If this is the case, we will do our best to ensure that their privacy policy adheres to similar standards of privacy protection and will request they comply with this Privacy Policy;
- (b) third party service providers or affiliates within or outside of Australia and who work on behalf of or with us to provide some of our administrative and other services, such as processing payments (such as credit card payments). We require such service providers to agree not to use such information except as necessary to provide the services to us;
- (c) our employees, contractors and/or related entities on a 'need to know' basis to continue to provide our products and services to you and to otherwise administer our organisation
- (d) professional advisers, dealers, and agents;
- (e) any party to whom our assets or business may be transferred or with whom we are merged;
- (f) when it is necessary to lessen or prevent a serious threat to a patient's life, health or safety or public health or safety;
- (g) when you are unable to act on your own behalf due to a health condition, we may need to discuss your health information with relatives or emergency contacts, in order that you are provided with appropriate care;
- (h) when there is a statutory requirement to share certain personal information (e.g., some diseases require mandatory notification).

6.2 We are committed to ensuring that any personal information we share is complete, accurate, UpToDate and relevant.

6.3 We may also disclose your personal information if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.

6.4 At your request, we will share your personal information with your representative or any person acting on your behalf (for example, financial advisers, lawyers, attorneys, accountants, executors, administrators, trustees or auditors).

7. DOXXING

It is a criminal offence to publish personal information online with the intent to harass, threaten or cause harm. We comply with all laws relating to privacy and doxxing and take measures to prevent unauthorised disclosure of personal information online.

8. COMMUNICATION AND MARKETING

8.1 We may from time to time use your personal information in order to communicate and market our products and services to you via newsletters, email invitations and updates about our products and/or services, upcoming workshops and events. These communications may be sent in various forms, including without limitation mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. You may opt out of direct marketing at any time by notifying us in writing or by using the opt-out facilities provided in the communication.

- 8.2 We do not provide your personal information to other organisations for the purposes of direct marketing.

9. HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION

- 9.1 We are committed to ensuring the safety and security of your personal information. We will take reasonable technical and organisational precautions to protect your information from misuse interference, loss, unauthorized access, modification, or disclosure. For example:
- we limit access to personal information to a “need-to-know” basis
 - we keep all hard copies of personal information in secure premises, accessible by authorised personnel only;
 - we store data securely on cloud servers or other types of networked or electronic storage, with providers who are subject to encryption and data protection policies;
 - our devices are protected by password and are stored in secure premises;
 - the devices we use to collect, hold, use and disclose personal information contain anti-virus software;
 - all conversations involving the discussion of personal information take place in private, where they are unable to be overheard by unauthorised personnel;
 - our Website contains pages encrypted with SSL (Secure Sockets Layer) to ensure the safety of any data submitted through use of this Website;
 - our email data is encrypted.
- 9.2 Despite our best efforts to securely store your information, due to the nature of email and the internet, we cannot guarantee the privacy or confidentiality of your personal information.
- 9.3 If you communicate with us via electronic means such as email, Zoom, Skype, contact forms or social media platforms, we do not have full control over the transmission or storage of any personal information disclosed. By participating in such forms of communication you understand and accept that there is an inherent risk of disclosure or loss of your personal information for which we cannot be held responsible.
- 9.4 We will destroy or de-identify your personal information when it is no longer needed for the purpose for which it was obtained, except where we have a legal obligation to retain such information, such as your health information. We will never permanently store complete credit card details.
- 9.5 When you provide us with personal information, that information may be collected, stored, and processed on servers located outside of Australia. As electronic or networked storage can be accessed from various countries via an internet connection it is not always practicable to know in which country your information may be accessed or held.

10. LINKS TO OTHER SITES

- 10.1 We may provide links on our Website to third party websites, for your information and convenience. Please note we do not have any control over such websites and are therefore not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. We note those websites are not governed by this policy. We encourage you to be safe and make sure you read their privacy policy before giving them your personal information.

11. HOW YOU CAN ACCESS AND CORRECT YOUR PERSONAL INFORMATION

- 11.1 We will take reasonable steps to ensure that any personal information we collect is up-to-date, complete relevant and not misleading, and any personal information that we use or disclose is up-to-date, complete, relevant, and not misleading.
- 11.2 You may contact us using the details set out below to seek any of the following:

- (a) **Access:** You can ask to be provided full information about your personal information that we hold.
 - (b) **Change or correct information:** You can also ask us to change or correct any information we hold about you.
 - (c) **Delete your personal information:** You can ask us to delete or destroy your personal information. Please note that certain conditions may apply to the exercise of this right. Please note that if we agree to delete your information, due to backups and records of deletions, it may be impossible to completely delete your information, however we will functionally delete the information and not sell, transfer, or use your personal information moving forward.
- 11.3 We will respond to any request to access information within a reasonable time.
- 11.4 We will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.
- 11.5 To protect your Personal Information, we may require identification from you before releasing the requested information.

12. COMPLAINTS ABOUT A PRIVACY BREACH

- 12.1 We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing. We will then attempt to resolve it within 30 days.
- 12.2 If you are not satisfied with our response, you may also contact the Office of the Australian Information Commissioner (OAIC). Generally, the OAIC will require you to give them time to respond before they will investigate. For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992.

13. OVERSEAS TRANSFER

- 13.1 We may disclose personal information, including but not limited to, third parties and contracted service providers (such as virtual assistants) located outside Australia for processing, store, administrative or back up purposes.
- 13.2 If we transfer personal information overseas, we take reasonable steps to ensure that overseas recipients handle personal information in accordance with the Australian Privacy Principles (APPs) and applicable privacy laws. These steps may include requiring contractual obligations that bind overseas recipients to comply with the APPs and the Privacy Act 1988 (Cth). However, you acknowledge that, by consenting to the disclosure of your personal information to overseas recipients, you accept that:
- We may not be able to monitor or control how those overseas recipients handle your personal information;
 - We are not required to take further steps to ensure compliance beyond those prescribed by law; and
 - We will not be liable for any breach of the APPs or the Privacy Act 1988 (Cth) by those overseas recipients.

14. GDPR

- 14.1 If you are a resident of the European Union (EU) or the United Kingdom (UK), the General Data Protection Regulation (GDPR) governs who we collect, store and process your Personal Data. The GDPR provides you with specific rights regarding your Personal Data, and as the “controller” of your Personal Data, we are committed to compliance with GDPR data protection principles.
- 14.2 **Definition of Personal Data:** The GDPR defines Personal Data as any information that relates to an identifiable individual, either directly or indirectly, including but not limited to names,

contact details, identification numbers, online identifiers, or any factors specific to that individual.

14.3 **Your rights under GDPR:** If you are an EU or UK resident, you have the following rights concerning your Personal Data, which you can exercise by submitting a request to our Privacy Officer (contact details provided at the end of this Policy):

- Right to be informed – you have the right to be informed about how and why your Personal Data is collected, the purposes for its processing, how long it will be retained and who it will be shared with;
- Right of access – you can request access to a copy of the Personal Data we hold about you;
- Right to rectification – if your Personal Data is inaccurate or incomplete, you have the right to request corrections or updates;
- Right to erasure (Right “to be forgotten”) – you may request the deletion of your Personal Data if it is no longer necessary for the purpose it was collected, if you withdraw consent or if there is no other legal basis for processing;
- Right to withdraw consent – if we process your Personal Data based on your consent, you may withdraw your consent at any time;
- Right to restrict processing – in certain circumstances, you may request that we restrict how we process your Personal Data;
- Right to data portability – you can request to receive your Personal Data in a structured, commonly used, and machine-readable format or ask for it to be transferred to another organisation;
- Right to object – you can object to the processing of all or some of your Personal Data in certain circumstances, including direct marketing;
- Rights related to automated decision making and profiling – you have the right to be informed about and challenge any automated decisions made about your using your Personal Data. If such decisions significantly impact you, you may request human intervention.

If you wish to exercise any of these rights, please contact our Privacy Officer on the contact details at the end of this policy.

15. CHANGES TO THE PRIVACY POLICY

Any changes to this Privacy Policy will be posted onto the Website. Unless stated otherwise, changes will be effective immediately upon being placed onto the Website. Your continued use of the Website means you agree to be bound by the amended Privacy Policy.

16. CONTACT DETAILS

For any questions or notice, please contact us using these details:

Your privacy contact name: Caroline Watson
Email address: caroline@thrivingpossibilities.com.au
Phone: +61 403 089 810
Postal address: 312 Colburn Avenue, Victoria Point, QLD 4165

This Privacy Policy was last updated: 7th December 2025