

## 10.0 Privacy Policy

This privacy policy will give you a more comprehensive explanation of how your Personal Information is handled by The Empathy Initiative. If there is anything that is not clear from this privacy policy, please feel free to email us at [jeremy@jeremykalbstein.com.au](mailto:jeremy@jeremykalbstein.com.au).

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way 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 website of The Office of the Australian Information Commissioner at [www.aoic.gov.au](http://www.aoic.gov.au).

What is Personal Information and why do we collect it?

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

This Personal Information is obtained in many ways including correspondence, by telephone, by email, and via our website [www.jeremykalbstein.com.au/the-empathy-initiative](http://www.jeremykalbstein.com.au/the-empathy-initiative).

We collect your Personal Information for the primary purpose of providing our services to you, namely our eSafety educational services, providing information to our clients, and for marketing. 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.

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.

### **What we collect from you**

#### *Mailing list*

If you sign up to our mailing list, this means that you have opted-in and have consented to us sending you emails relating to the services or products we provide as a company. Don't worry, we won't spam you. We send all emails as per the guidelines set out by the Australian Communications and Media Authority.

#### *User contact forms*

When you fill out a contact form on our website, we will collect that information and

use it to get in touch with you in response to your query. We may use the information to reach out to you to inform you of some of the services we provide.

### **Direct Marketing**

When it comes to direct marketing, no one likes being spammed. At The Empathy Initiative, we may use your personal information to send you advertising that is customised to your interests, characteristics or general location.

Opt-out: As with all direct marketing correspondence that you receive from us via email, there is always an unsubscribe button or link located at the bottom of the email. With this you can manage which messages you receive from us.

### **What we collect from your online activity**

[www.jeremykalbstein.com.au/the-empathy-initiative](http://www.jeremykalbstein.com.au/the-empathy-initiative) uses cookies and other digital identifiers that fall into the following three categories:

- Site performance indicators: these give us information on how our website is used so that we can make the necessary improvements or amendments to make your experience better.
- Analytics Cookies: these give us the statistics to understand how many people are on our website, which areas are popular and which areas we need to work on.
- Advertising Cookies: we use these cookies to understand what type of advertising would be suited to someone like you. That way, you would receive ads that are more likely to be relevant to you.

Cookie rights: You can always disable our use of cookies by changing the security settings of your browser. However, please bear in mind that this may affect how some items are displayed on our website or may prevent some items being displayed.

### **What we collect and receive from others**

Social Network widgets and buttons (Pinterest, Facebook etc.)

By clicking or using any social network widgets on our website, you understand that you do so in accordance with the terms and privacy policy of those services. 'Liking' or 'Following', and content posted using these widgets may become visible to your social network.

### **Advertising**

We may use your personal information to deliver advertising that is more customised or relevant to your interests or location. This does not mean that you will receive more ads, it simply means that we will do our best to make them relevant and tailored to your interests. If you have any questions or concerns relating to the advertising on

our website (either hosted by a third party or by us, e.g. Google AdWords), feel free to contact us at [jeremy@jeremykalbstein.com.au](mailto:jeremy@jeremykalbstein.com.au).

### **Third party polling and survey plugins (Survey Monkey etc.)**

When you fill out polls or surveys on our website using Survey Monkey or another third-party survey provider, please bear in mind that while we retain control of the data that you provide, all data provided is collected under the privacy policy of that provider and therefore may vary from provider to provider. We select providers who advise us that they adhere to Australian privacy laws.

### **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. 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.

### **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.

### **Disclosure of Personal Information**

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

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

There are only a limited number of exceptions which allow or require The Empathy Initiative to use or disclose your children's personal information for other purposes, and they include the following: (1) when required or authorised by or under an Australian law or a court/tribunal order, such as disclosure to the Department of Education, (2) when The Empathy Initiative reasonably believes the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety, and it is unreasonable or impracticable to obtain the individual's consent to the use or disclosure, and (3) when The Empathy

Initiative reasonably believes that the use or disclosure is reasonably necessary to assist in locating a person who has been reported as missing.

### **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.

When 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 for archival purposes.

### **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. You can update your Personal Information by updating your account at any time.

### **Policy Updates**

This Policy may change from time to time and is available on our website.

### **Complaints Handling**

If you have any complaints or feel that there has been a breach of the Australian Privacy Principles or a registered APP code, you can contact us at [jeremy@jeremykalbstein.com.au](mailto:jeremy@jeremykalbstein.com.au) or via phone, 0435 743 403.

If you are not satisfied with the process of making a complaint you may make a complaint to the Information Commissioner on the details below:

Office of the Australian Information Commissioner  
GPO Box 5218 Sydney NSW 2001  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Telephone: 1300 363 992  
Fax: 02 9284 9666

### **How to Contact Us**

We understand that your personal information is important to you and are thrilled that you made it this far! If you have any questions or concerns about this policy or our practices, you can get in touch with us in the following ways:

Email: [jeremy@jeremykalbstein.com.au](mailto:jeremy@jeremykalbstein.com.au)

Phone: 0435 743 403

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