

## Privacy at Redbourne

Redbourne Business Services (Australia) Pty Limited (ACN 095 164 588) (**Redbourne**) is bound by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth). The APPs are designed to protect the confidentiality of personal information and the privacy of individuals by regulating the way personal information is managed.

In summary, the APPs define '*personal information*' as information or an opinion relating to an individual which can be used to identify that individual.

We understand that when you interact with Redbourne the privacy and confidentiality of your personal information is important to you. For this reason, we are committed to safeguarding the personal information you provide to us.

This Privacy Policy describes your rights regarding Redbourne's collection, storage, use, protection and sharing of your personal information. This policy applies to all of Redbourne's websites, software applications, products and services, including Child Care Central, KindCare, Harmony Software, rediCASE and redPAY.

You accept this Privacy Policy when you sign up for, access or use our products and services, or your personal information is collected by us as it is required or authorised by or under an Australian law or a court/tribunal order.

### Why does Redbourne collect personal information?

In order to understand and meet the needs of its clients and their customers, and provide the services they require, Redbourne may need to collect certain personal information. Redbourne will only collect personal information if it is reasonably necessary for one or more of its own, or its clients, functions or activities.

### How Redbourne collects and holds personal information

Whether for Redbourne or its clients, Redbourne will only collect personal information that is necessary for providing a particular service or completing a business activity. The information will be collected in a non-intrusive manner, by fair and lawful means and in accordance with relevant regulatory guidelines and industry codes. If it is reasonable and practicable to do so, Redbourne will collect personal information about an individual only from that individual.

Redbourne may collect personal information in a variety of ways, including by mail, telephone, email, internet and intranet, personal contact, fax and through business activities. In addition, as part of the quality assurance program undertaken on behalf of a number of its clients, Redbourne records all incoming telephone calls that are placed to its customer query section.

Redbourne may also receive personal information from clients about their customers, or directly from their customers. When clients use Redbourne's products or services, they may collect, store and use their customers' personal information. It is your responsibility to ensure that you are authorised to disclose the information to Redbourne, and that Redbourne may collect, use and disclose the information in accordance with this Policy. In these circumstances, it is your responsibility to ensure that your clients are aware of, and consent to, this Policy.

### Kinds of personal information collected and held by Redbourne

The types of personal information collected by Redbourne in relation to its clients, its clients' customers, its employees and other people who come into contact with Redbourne in the course of business, may include (but are not limited to) information about:

- contact information, such as your name, address, phone, email and other similar information;
- financial information, including bank account and credit card details;
- detailed personal information, such as your date of birth;
- child care related information, including customer reference numbers and child attendance information; and
- health care related information.

### **Why Redbourne collects, holds, uses and discloses personal information**

The APPs require Redbourne to use personal information only for the primary purpose for which it is collected, or for secondary purposes that are related to the primary purpose.

In general, Redbourne uses personal information for the following purposes:

- to communicate with its clients and their customers;
- to verify its client's identity, including during account creation and password reset procedures;
- perform targeted marketing, service update notices, and promotional offers;
- to provide services and customer support;
- to process direct debit and BPay transactions and to send notices about those transactions;
- to provide its clients' services to organisations and individuals upon request;
- to help Redbourne manage and enhance its clients' services, including by surveying its clients' customers on their future needs;
- to consider applications for employment; and
- to comply with legal obligations.

Depending on the product, service or issue concerned, Redbourne may disclose personal information, including a recording of a telephone call, to:

- Redbourne's internal employees and contractors;
- banking and financial institutions, including credit card schemes;
- credit reporting and collection agencies;
- the client in respect of whose product or service the information was collected;
- other organisations that are contracted to our client to provide products or services in relation to the information collected;
- its contractors, such as IT providers, who provide services to Redbourne to maintain and develop its operations;
- insurers, credit providers, courts, tribunals and regulatory authorities (including the Australian Tax Office) as required or authorised by law;

- a relevant agency where the use or disclosure of the information is necessary to lessen or prevent a serious and imminent threat to an individual's life, health or safety;
- credit reporting or reference agencies or insurance investigators; or
- to any other individual or organisation that the individual has consented to disclose the information to.

If you are the contact person for one of Redbourne's customers or one of their clients, personal information such as your name may be used by Redbourne to manage its relationship with that organisation or individual.

Redbourne may also disclose de-identified personal information to the public for statistical and informational purposes.

Redbourne does not disclose personal information to overseas recipients. In the unlikely event that Redbourne does disclose personal information to overseas recipients, Redbourne will first ensure that the overseas recipient does not breach the APPs.

### **Sensitive information is subject to greater restrictions**

Some personal information collected by Redbourne is considered '*sensitive*'. Sensitive information that Redbourne may collect includes, but is not limited to, a person's state of health or medical history, religious beliefs or affiliations, sexual preferences or practices, criminal record and racial or ethnic origin.

Redbourne will not collect sensitive information about you unless you have consented to provide the information or the collection is required by law.

The APPs require that sensitive information be used and disclosed only for the purposes for which it was provided, or a directly related secondary purpose, unless you agree otherwise or the use or disclosure of the information is required by law or to prevent a serious and imminent threat to an individual's life or health.

### **Security of personal information**

Redbourne is committed to keeping personal information secure. All reasonable precautions will be taken to protect information from loss, misuse, unauthorised access, modification, interference or disclosure. Except as described above, Redbourne will not knowingly disclose personal information to outside parties unless you have consented to the disclosure or Redbourne is required by law to do so.

Our operations are supported by a network of computers, cloud-based servers, and other information technology infrastructure. Redbourne ensures all personal information data is stored and processed in cloud-based servers hosted in Australia.

Redbourne expects its employees who handle personal information to respect the confidentiality of that information and the privacy of individuals. Redbourne regards privacy very seriously and will take appropriate action in response to any breach of its obligations.

### **How you can access your personal information held by Redbourne**

Redbourne has appointed a Privacy Officer to oversee its management of personal information in accordance with this Policy and the *Privacy Act 1988* (Cth). The Privacy Officer's contact details are set out below.

Under the APPs, you have the right, in most cases, to obtain a copy of any personal information that Redbourne holds about you, including the recording of a call you make to Redbourne which

is recorded by Redbourne's monitoring system. Please contact the Privacy Officer if you wish to access any of your personal information held by Redbourne.

Further, where an individual requests access to the personal information held by you in a Redbourne software application, you must assist Redbourne with any requests by the individual to access or update their personal information.

If you make a request of this kind, Redbourne will require you to verify your identity and, depending on your request, Redbourne may charge a fee to provide you access. Redbourne will advise you in advance of any fees that will apply to access your personal information.

Redbourne endeavours to ensure that the personal information it holds is accurate, complete and current. Under the APPs, you have the right to advise Redbourne of any perceived inaccuracy in the information it holds about you. Please contact the Privacy Officer if you believe that the information Redbourne holds about you is inaccurate or becomes out-of-date.

Please note that in circumstances prescribed by the APPs, Redbourne may refuse you access. For example, Redbourne may not allow you to access your personal information to the extent that doing so would:

- pose a serious threat to the life, health or safety of any individual, or to the public health or public safety; or
- it would have an unreasonable impact on the privacy of other individuals; or
- the request for access is frivolous or vexatious; or
- the information relates to existing or anticipated legal proceedings between Redbourne and the individual, and would not be accessible by the process of discovery in those proceedings; or
- reveal Redbourne's intentions in respect of negotiations with the individual in such a way as to prejudice those negotiations; or
- be unlawful; or
- be authorised under an Australia law or a court/tribunal order; or
- prejudice Redbourne taking action in respect of an unlawful activity or serious misconduct; or
- prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process.

In the event Redbourne refuses to grant you access to your personal information, Redbourne will supply you with written notice that sets out the reasons for the refusal.

## **Marketing**

Redbourne may from time to time send you marketing and promotional information about products and services it offers. Redbourne does not sell or rent your personal information to third parties for marketing purposes.

Should you not wish to receive any direct marketing or promotional material from Redbourne about its products and/or services, simply provide Redbourne with written notice to this effect.

## **Enquiries or complaints**

If you have any questions about this Policy or Redbourne's privacy practices, or if you consider that any action of Redbourne breaches this Policy or the APPs, please contact Redbourne's Privacy Officer.

If you are not satisfied with our response, you can contact the Office of the Australian Information Commissioner on 1300 363 992.

## **Updates to Redbourne's Privacy Policy**

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

## **How to contact us**

You can contact Redbourne about a privacy-related issue by email, phone or post.

Email: [privacy@redbourne.com.au](mailto:privacy@redbourne.com.au)  
Phone: (07) 3632 5444  
Address: Privacy Officer  
Redbourne Business Services (Australia) Pty Limited  
PO Box 492  
Chermside South QLD 4032