



Partners in Progress

Privacy Policy

Privacy Policy

Partners in Progress (ACN: 667000008) (**Partners in Progress, us/we/our**), treats the privacy and security of your personal information very seriously.

This Privacy Policy (**Policy**) describes how we collect, store, use, transfer and disclose the personal information that we collect from you when you access and use **Our Products and Services**, being:

- our website, located at: www.partnerinprogress.org (**Website**);
- our education, teaching and other materials which are available to view and access on our Website with a user account (**Products**); and
- our other products and services.

We are bound to comply with the following privacy laws:

- if you are located in Australia, the Australian Privacy Principles in the Privacy Act 1988 (Cth) (**Privacy Act**);
- if you are located in the European Economic Area, the EU General Data Protection Regulation (**GDPR**); and
- if you are located in the United Kingdom, the United Kingdom General Data Protection Regulation (**UK GDPR**).

We refer to the European Economic Area and United Kingdom collectively as the **European Area** in this Policy. Where we say “**personal information**” in this Policy, this refers to any information associated with an identified or identifiable individual.

We have adopted internal policies and procedures to ensure that the personal information we collect, store, use and disclose is dealt with in accordance with the Policy. There are sections in this Policy that are specific to individuals located in Australia and the European Area, as labelled. If we change the terms of this Policy, we will display the changes on the Website, or otherwise notify you in writing.

How do we collect your personal information?

Partners in Progress may collect your personal information in the following ways:

- where you have requested Our Products and Services;
- where you have inquired about Our Products and Services or otherwise communicated with us in person, in writing or by telephone;
- through the use of browser “cookies” or trackers when you access our Website;
- when you attend an event hosted by us;
- from third parties from whom we have purchased your personal information; and

- in such other situations, where we collect personal information that is reasonably necessary for the proper supply of Our Products and Services.

If you supply us with any personal information that we did not solicit, and that information is not reasonably necessary for us to hold in connection with one of our functions or activities, we will destroy or de-identify that information as soon as practicable after it has been provided to us.

If you are located in Australia and not 15 years of age or over, or if you are located in the European Area and not 16 years of age or over, you should only provide us with your personal information if your parent or guardian has consented to the collection of that information on your behalf in accordance with this Policy.

What personal information do we collect?

The types of personal information we collect depends on your relationship with us and the nature of your interaction with us. In general, Partners in Progress may collect the following types of personal information:

- names, addresses, postcodes, email addresses, contact phone numbers, gender, job titles, places of employment; and
- other personal information that you may voluntarily provide to us in using the Website, accessing Our Products and Services or otherwise communicating with us.

You may elect not to provide any personal information to us, or use a pseudonym. If this occurs, you acknowledge that it may impact on our ability to provide you with Our Products and Services and correspond with you.

(Australia only) Do we collect sensitive information?

We may, but typically do not, collect sensitive information from you. Sensitive information is a subset of personal information that includes (among other things) information that reveals your racial or ethnic origin, religious beliefs or sexual orientation, or information about your health.

We collect sensitive information only where reasonably necessary to provide Our Products and Services to you.

Where it is practicable to do so, we will seek your consent before we collect any sensitive information from you for the purposes described above. Your consent to the collection of sensitive information may be implied in the circumstances.

(European Area only) Do we collect special category data?

We may, but typically do not, collect any special category data from you. Special category data is a subset of personal information that includes (among other things) information that reveals your racial or ethnic origin, religious beliefs or sexual orientation, or information about your health.

We collect special category data only where reasonably necessary to provide Our Products and Services to you, and we will seek your consent before doing so.

How will we use your personal information?

We may collect, hold and use your personal information for the following purposes:

- as necessary to provide Our Products and Services to you;
- to fulfil any legal obligations we have in relation to your personal information;
- to inform you of any updates to Our Products and Services or changes to the Policy; and
- for any other secondary purposes where you might reasonably expect us to use your personal information, which are related to the primary purposes listed above.

We may share information, which was originally personal information that we collected from you, in a depersonalised or aggregated form with third parties. We will only do this in circumstances where that information cannot be used to identify you personally.

We will not disclose your personal information for reasons other than those listed above unless:

- you have consented to that specific disclosure;
- there are reasonable grounds to believe that disclosure is necessary to prevent or lessen a threat to your life or health or that of another person;
- the disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim; or
- the disclosure is permitted, required or authorised by law.

How do we store your personal information and for how long?

Partners in Progress take all reasonable steps to protect your personal information from misuse or unauthorised access or disclosure. For example, by restricting access to your personal information to authorised personnel only, and implementing password protection to access personal information (with those passwords required to be kept secure by authorised personnel). However, data

security measures can never be guaranteed and there are inherent risks in transmitting any information, including your personal information, over the internet.

We will only retain your personal information for as long as we have a genuine business need to do so. For example, we will retain your personal information while we are providing you with Our Products and Services. Once we no longer need to retain your personal information, we will destroy or de-identify that information, unless we are required by law to retain it.

Do we use your personal information for the purposes of marketing?

Your personal information may be used by us to:

- market and offer Our Products and Services to you;
- notify you of new developments and updates to Our Products and Services; and/or
- make other promotional communications to you, including by email or telephone.

We will only send you direct marketing communications if you have provided your consent to this. If you do not wish to receive direct marketing communications from us, you may opt-out at any time by following the unsubscribe link in our electronic promotional communications, or contacting us with your request at: dc@partnerinprogress.org

We will not disclose your personal information to third parties to enable those parties to directly market their products or services to you unless you have expressly consented to that disclosure.

(Australia users only) Do we disclose your personal information to third parties located outside of Australia?

Your personal information may be stored by our Third-Party Providers. As our Third-Party Providers operate globally, we cannot say with certainty where their servers are located or the countries out of which they operate at any given time. Further, these locations may be subject to change without notice to us.

Your personal information may also be accessed and used by our staff who are temporarily located outside of Australia.

By supplying your personal information to us, you consent to storage of your personal information by our Third-Party Providers, and our staff accessing and using your personal information, in any location in the world.

(European Area users only) Do we disclose your personal information to third parties located outside of the European Area?

As Australians Together is an organisation based in Australia, by providing your personal information to us, you consent to our handling of your personal information within Australia in accordance with this Policy.

Your personal information may be stored by our Third-Party Providers. As our Third-Party Providers operate globally, we cannot say with certainty where their servers are located or the countries out of which they operate at any given time. Further, these locations may be subject to change without notice to us.

Your personal information may also be accessed and used by our staff who are temporarily located outside of Australia or the European Area.

By supplying your personal information to us, you further consent to storage of your personal information by our Third-Party Providers, and our staff accessing and using your personal information, in any location in the world.

Do we collect personal information through cookies or trackers?

When you visit our Website, we may collect information about your computer/device, IP address, location, pages viewed on our Website, and time spent on our Website, using browser “cookies”. These are small text files placed on your device.

We collect information from cookies to improve the operation of our Website, to direct you to the most appropriate content and to remember your preferences for the next time you access our Website. By using our Website, you consent to our use of cookies in accordance with this Policy. You can opt-out of cookie technology through changing the settings on your browser. However, this may affect the way you experience our Website.

We may use the following analytics services:

1. **Google Analytics** – this service collects data about our Website users as part of our information-gathering processes (for further details, see: www.google.com/analytics/). Google Analytics only provides us with aggregated data and does not identify any user personally.
2. **Facebook Pixel** – this service collects data about your interactions with our Website by

using “tracking pixels”. This data is then used to serve targeted advertisements for Our Products and Services to you and others on Facebook, and measure the success of our Facebook advertising campaigns by reporting on the actions people take after clicking our advertisements on Facebook. Any data disclosed to us by this service cannot be used to identify you personally. You can opt-out of receiving targeted advertisements on Facebook through the settings on your Facebook account.

We do not merge any personal information we have collected from you with data obtained through browser cookies, Facebook Pixel or Google Analytics or any other analytics software/services we may use.

Are we responsible for the privacy practices of third parties?

This Policy applies solely to personal information we collect from you. We are not responsible for the collection of personal information and/or the privacy practices of any third parties, including by our payment services provider, analytics services used on our Website, or websites which may be linked on our Website.

For more information about how relevant third parties will collect, store and use your personal information, please refer to their privacy policies.

(European Area users only) What legal basis do we rely on to use your personal information?

When we collect your personal information and decide how it used or processed, we act as a data controller under the GDPR and UK GDPR. We will process your personal information in accordance with one or more of the following legal bases:

- **Legitimate interests:** we will process your personal information for our legitimate interests. These interests include allowing you to access and use our Website and Products, to send you marketing content we think may be of interest to you, to contact you if you leave your contact details with us or if you otherwise initiate contact with us, and for our internal business purposes. We don't believe any of these activities will prejudice you in any way. However, you have the right to object to us processing your personal information in this way (see “How can I control use of my personal information?” section below).
- **Performing a contract:** we will process your personal information in connection with performing a contract we have entered into with you or intend to enter in with you, such

as where you have requested Our Products and Services to be supplied to you.

- **Legal obligation:** we may process your personal information where we are subject to a legal obligation to do so.
- **Consent:** we will rely on the consents provided by you in this Policy and otherwise to process any of your personal information for the consented purposes.

When we collect your personal information from a data controller, we act as a data processor under the GDPR and UK GDPR. We will only process your personal information in accordance with the data controller's instructions and any data processing agreement we have with the data controller.

(Australia users only) How can I access or correct my personal information?

You may request a copy of your personal information that we hold.

We may refuse to provide you with a copy of your personal information that we hold, in certain circumstances set out in the Privacy Act. We also reserve the right to charge you for the reasonable expenses that we may incur in preparing and sending you a copy of your personal information that we hold.

We will take reasonable steps to correct any of your personal information that we hold where the information is inaccurate or out of date, or you have requested us to correct the information. We will not charge you to update your personal information.

If we refuse your request to provide a copy of your personal information that we hold, or to correct your personal information that we hold, we will give you written notice of our refusal with supporting reasons.

(European Area users only) How can I control the use of my personal information?

You have the following rights in connection with your personal information:

- **The right to access** – you have the right to request copies of your personal information that we hold.
- **The right to rectification** – you have the right to request correction of any personal information we hold that you believe is inaccurate or incomplete.
- **The right to erasure** – you have the right to request that we erase your personal information that we hold.
- **The right to restrict processing** – you have the right to request restrictions on the

processing of your personal information by us.

- **The right to object to processing** – you have the right to object to our processing of your personal information.
- **The right to data portability** – you have the right to request that we transfer your personal information that we hold to another organisation, or directly to you.

If you would like to exercise any of these rights in relation to your personal information that we hold, please contact us by email at: dc@partnerinprogress.org. We will respond to any requests made within one month and not charge you unless your request is unreasonable.

How to contact us

If you have any questions or concerns about our handling of your personal information or this Policy, you can contact us in the following ways (addressed to the Privacy Officer):

- **Email:** dc@partnerinprogress.org

If you have a complaint or a privacy-related concern in relation to our business or this Policy, please provide us with the opportunity to resolve the matter by contacting us using the one of the methods outlined above. Once we have received a complaint or privacy-related concern, we will try to work with you to resolve the matter.

Should you not be satisfied with the resolution of any complaints made to us, you are able to seek further redress through:

- where you are located in Australia, the Office of the Australian Information Commissioner (see: www.oaic.gov.au); and
- where you are located in the European Area, your local data protection regulator.