

SMOOSH Privacy Policy

SMOOSH values the privacy of your personal information and we are committed to handling your personal information in a responsible way in accordance with the *Privacy Act 1988* (Cth) (the Act) and the Australian Privacy Principles (APPs) as contained within the Act. This is our Privacy Policy and it sets out how we will collect, hold, use and disclose your personal information. We recommend that you read it carefully.

WHAT PERSONAL INFORMATION WE COLLECT AND WHY

We collect, hold, use and disclose personal information for the purpose of operating SMOOSH. This will be collected directly from you and includes information such as name, gender, date of birth, address, contact information, occupational and relevant financial information (e.g., direct debit information). Some personal information collected in this form may be sensitive information, such as health information about your child/ren. Information may be provided to us via hard copy form, in person or over the telephone.

We only collect, hold and use the information you have disclosed in order to perform our duties and activities, or as permitted by law. The information may also be disclosed to the Department of Communities and Justice (DCJ), a court of law or other government agency if it is required by law or a funding agreement to do so; or with a health agency, if there is a serious and imminent threat to a person's life, health or safety. Otherwise, this information will only be disclosed with your prior consent, with the intended recipient of the information and the reason for sharing the information being clearly written.

If you want to deal with us while not identifying yourself (i.e. anonymously or by using a pseudonym), we will allow you to do this where it is practicable (for example when you make a general inquiry of us).

Please note that the services we provide require us to obtain personal information and to identify the individuals we are dealing with. If you decide not to provide us with the information required we may not be able to provide a service.

Sensitive Information

As noted above, we will collect some sensitive information in order to execute our provision of services. Such information may include your race, ethnicity, health information about your child/ren, and financial information (e.g. your bank account

details or your credit card information). All information is handled according to the National Privacy Principles.

HOLDING PERSONAL INFORMATION

We may hold your information electronically and on paper/in hard copy. We place a high priority on the security of personal information, and we are committed to protecting the personal information that you provide to us. We take reasonable steps to ensure your personal information is secure and we use and maintain appropriate safeguards to prevent misuse and loss and from unauthorised access, modification or disclosure. We implement administrative, physical and technical safeguards to protect the confidentiality and integrity of your personal information and data that we use and hold.

We retain information relating to you for three years after your youngest child exits the service. We may keep some information (in the case of illness, injury or trauma) until the child reaches the age of 25 years old, in accordance with legal requirements. Once information is no longer required, it will be destroyed in a secure manner.

HOW YOU MAY ACCESS YOUR PERSONAL INFORMATION AND SEEK CORRECTION OF IT

Accessing your information

You may request access to any personal information we hold about you at any time by contacting the SMOOSH Director (see 'How to contact us or make a complaint' section below). Where we hold information that you are entitled to access, we will try to provide you with mutually agreeable means of accessing it (for example, by mailing or emailing it to you or facilitating inspection). The SMOOSH Director will need to establish the identity of the individual requesting the information prior to providing it. A fee may apply to recover reasonable costs of making the information available.

There are a number of situations where we may deny an individual access to personal information in accordance with the APPs. These can include circumstances where it would have an unreasonable impact on the privacy of other individuals, would result in a breach of confidentiality, the information relates to existing or anticipated legal proceedings, we have reason to suspect that unlawful activity or misconduct of a serious nature is being or may be engaged in, or where the law requires or authorises such access to be denied. The SMOOSH Director will advise you if any of these or other circumstances apply.

Keeping your information accurate

We take reasonable steps to ensure that the personal information we hold is accurate, up-to-date and complete. However, we also rely on you to advise us of any changes to your information to help us do so. If you believe your personal information is not accurate, up-to-date or complete, then please contact the SMOOSH Director.

To assist us in maintaining correct records, we ask you to inform us in writing of any changes in your personal information provided to us.

If you establish that information held is not accurate, complete or up to date, then we will take reasonable steps to correct the information unless it is impractical or unlawful to do so. If you establish that information held is not accurate, complete or up to date and we have shared that information with another APP entity, then if you request us to notify those entities we will take reasonable steps to do so unless it is impractical or unlawful to do so.

HOW TO CONTACT US OR MAKE A COMPLAINT?

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your personal information or a possible breach of your privacy, you can contact the SMOOSH Director using the details set out below.

We treat any concerns or complaints that you may have with respect and confidentiality. We aim to ensure complaints are resolved in a timely and appropriate manner.

You can contact the SMOOSH Director by:

- Email – info@smoosh.com.au
- Phone – (02) 9516 5600
- Post – 56 Swanson Street, Erskineville NSW 2043

If your concerns are not resolved to your satisfaction or you would like further information in regards to the Privacy Act, the matter can be referred to the Office of the Australian Information Commissioner on 1300 363 992.

We may change this Privacy Policy from time to time. Any updated versions of this Privacy Policy will be posted on our website.

This Privacy Policy was last updated in June 2021 and was correct at the time of publication.