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## SIX STAR WELLBEING SURVEY

### PRIVACY POLICY

#### 1. INTRODUCTION

This document sets out the privacy policy of ELITE PERFORMANCE PTY LTD ABN 83 101 160 552 operating under the business name Six-Star Wellbeing (referred to in this privacy policy as 'we', 'us', or 'our').

**This privacy policy only applies when you take any of our surveys through the Six-Star Wellbeing website available at <https://www.sixstarwellbeing.com.au/>.**

We take our privacy obligations seriously and have created this privacy policy to explain how we store, maintain, use and disclose personal information.

By providing personal information to us, you consent to our storage, maintenance, use and disclosing of personal information in accordance with this privacy policy.

We may change this privacy policy from time to time by posting an updated copy on our website and we encourage you to check our website regularly to ensure that you are aware of our most current privacy policy.

#### 2. TYPES OF PERSONAL INFORMATION WE COLLECT

The personal information we collect may include the following, **depending on the survey you complete:**

- name;
- country of residence;
- email address (not on surveys, but if you choose to contact us);
- age or age group;
- sensitive information as set out below;
- information in connection with our wellbeing surveys;
- your device identity and type, I.P. address, geo-location information, page view statistics, advertising data and standard web log information;
- information about third parties; and
- any other information provided by you to us via our website or our online presence, or otherwise required by us or provided by you.

#### 3. HOW WE COLLECT PERSONAL INFORMATION

We may collect personal information either directly from you, or from third parties, including where you:

- contact us through our website;
- participate in any of our surveys;
- submit any of our online sign up forms;
- communicate with us via email, telephone, SMS, social applications (such as LinkedIn, Facebook or Twitter) or otherwise; and
- interact with our website, social applications, services, content and advertising.

We may also collect personal information from you when you use or access our website or our social media pages. This may be done through use of web analytics tools, 'cookies' or other similar tracking technologies that allow us to track and analyse your website usage. Cookies are small files that store information on your computer, mobile phone or other device and enable and allow the creator of the cookie to identify when you visit different websites. If you do not wish information to be stored as a cookie, you can disable cookies in your web browser.

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We may use Google Analytics to collect and process data, including when you use third party websites or apps. To find out more see [How Google uses data when you use our partners' sites or apps](#).

#### **4. USE OF YOUR PERSONAL INFORMATION**

We collect and use personal information for the following purposes:

- to provide services or information to you including our wellbeing surveys;
- for record keeping and administrative purposes;
- to provide information about you to our contractors, employees, consultants, agents or other third parties for the purpose of providing goods or services to you;
- to improve and optimise our service offering and customer experience; and
- to comply with our legal obligations, resolve disputes or enforce our agreements with third parties;

We may disclose your personal information to cloud-providers, contractors and other third parties located inside or outside of Australia. If we do so, we will take reasonable steps to ensure that any overseas recipient deals with such personal information in a manner consistent with how we deal with it.

#### **5. PROVIDING INFORMATION FOR MINORS**

If you are providing personal and/or sensitive information on behalf of someone under the age of 18 (**Minor**), you must be that Minor's parent or legal guardian, or be a school providing consent, and you must provide consent for the Minor's personal and/or sensitive information to be collected, used and disclosed in accordance with this privacy policy. This includes where you are allowing your child or student to participate in any of our surveys.

We reserve the right to request evidence of this consent.

#### **6. SENSITIVE INFORMATION**

We may collect sensitive information about you during the course of providing you services. The type of sensitive information we may collect includes health information relating to your wellbeing, such as by participating in our surveys.

We generally only collect this sensitive information where you consent and provide us with this information. If you consent, your sensitive information may only be used and disclosed for purposes relating to providing you with our services and for data analytics.

We generally only have access to de-identified data that relates to sensitive information and have put in place a number of security measures that relate to accessing any sensitive information on our databases. We may use anonymous (de-identified) data collected from the surveys for research or writing article purposes).

Your sensitive information may also be used or disclosed to comply with our legal obligations.

#### **7. SECURITY**

We take reasonable steps to ensure your personal information is secure and protected from misuse or unauthorised access. Our information technology systems are password protected, and we use a range of administrative and technical measures to protect these systems. However, we cannot guarantee the security of your personal information.

#### **8. LINKS**

Our website may contain links to other websites. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of those linked websites and we suggest you review the privacy policies of those websites before using them.

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**9. REQUESTING ACCESS OR CORRECTING YOUR PERSONAL INFORMATION**

If you wish to request access to the personal information we hold about you, please contact us using the contact details set out below including your name and contact details. We may need to verify your identity before providing you with your personal information. In some cases, we may be unable to provide you with access to all your personal information and where this occurs, we will explain why. We will deal with all requests for access to personal information within a reasonable timeframe.

If you think that any personal information we hold about you is inaccurate, please contact us using the contact details set out below and we will take reasonable steps to ensure that it is corrected.

**10. COMPLAINTS**

If you wish to complain about how we handle your personal information held by us, please contact us using the details set out below including your name and contact details. We will investigate your complaint promptly and respond to you within a reasonable timeframe.

**11. CONTACT US**

For further information about our privacy policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

**Name:** Anthony Klarica

**Email:** [info@eliteperformance.com.au](mailto:info@eliteperformance.com.au)

Our privacy policy was last updated on 26 June 2020.