

**TINNITUS SERVICES PTY LTD ACN 667 749 975**  
**PRIVACY POLICY**

**1. ABOUT THIS POLICY**

- 1.1 Tinnitus Services Pty Ltd ACN 667 749 975 (**we, us, our**) values your privacy and takes the protection of your personal information series. This Privacy Policy (**Policy**) outlines the types of personal information that we usually collect, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure and your rights in relation to your personal information, including how to complain and how we deal with complaints.
- 1.2 We will handle your personal information in accordance with this Policy, and applicable legislation including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).
- 1.3 We may change this Policy from time to time by updating this webpage. We recommend you regularly check our website located at [www.tuneout.com.au](http://www.tuneout.com.au) (**Website**) regularly to ensure that you are aware of our current privacy policy.
- 1.4 In this Policy:
- (a) "**personal information**" means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not. It does not include information that is de-identified; and
  - (b) "**health information**" includes information or an opinion about the health, illness, disability or injury (at any time) of an individual.

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

- 2.1 The types of personal information we collect about you depends on the dealings you have with us, and may include:
- (a) contact information (such as your name, residential address, email address and phone number);
  - (b) basic demographic details (such as your date of birth, sex and industry);
  - (c) your health information (such as your presenting complaints);
  - (d) your billing information;
  - (e) the name of the organisation you work for and your professional title; and
  - (f) your interests and preferences.

**3. DEALING WITH US ANONYMOUSLY OR USING A PSEUDONYM**

- 3.1 Where possible and lawful, you may interact with us anonymously or using a pseudonym. For example, if you contact us with a general question we will not record your name unless we need it to adequately handle your question.
- 3.2 However, for many of our functions and activities we usually need your name, contact information and other details to enable us to provide our services or products to you.

**4. WAYS WE COLLECT YOUR PERSONAL INFORMATION**

- 4.1 We may collect personal information from or about you in different ways, including:
- (a) from you directly when you interact with us, e.g. via email, telephone or in person, when you complete a form, your emails and your interaction with our website;
  - (b) from third parties with whom we interact in order to provide our services; and
  - (c) publicly available sources, including social media.

## **5. COLLECTION OF INFORMATION VIA OUR WEBSITE**

- 5.1 When you visit our Website, we may also use 'cookies' or other similar tracking technologies that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our website may not work as intended for you if you do so.
- 5.2 Whilst we do not use browsing information to identify you personally, we may record certain information about your use of our Website, such as which pages you visit, the time and date of your visit, search engine referrals and the internet protocol address assigned to your computer.
- 5.3 Our Website may contain electronic images, known as web beacons. These electronic images enable us to count users who have visited certain pages on our website. Web beacons are not used by us to access your personal information – they are simply a tool we use to analyse which web pages are viewed, in an aggregate number.
6. In the course of serving advertisements to the Website (if any), third-party advertisers or ad servers may place or recognise a unique cookie on your browser. The use of cookies by such third party advertisers or ad servers is not subject to this Policy, but is subject to their own respective privacy policies.

## **7. PURPOSES FOR WHICH WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION**

- 7.1 We collect your personal information for the following purposes:
- (a) to provide you with the products and services you have requested;
  - (b) to contact you to respond to and enquiry;
  - (c) to provide our services;
  - (d) to manage and conduct our business;
  - (e) to offer or promote our products and services;
  - (f) to obtain feedback;
  - (g) to help us manage, develop and enhance our services, including our websites and applications, and;
  - (h) to comply with our legal obligations, resolve any disputes and enforce our agreements and rights with third parties.

## **8. DISCLOSING YOUR PERSONAL INFORMATION**

- 8.1 In the course of providing our products and services to you, we may disclose your personal information with the following:
- (a) third parties in order to provide our services, for example Talent LMS, Articulate360 and Stripe;
  - (b) organisations we contract to provide services on our behalf such as software suppliers and mail houses;
  - (c) anyone to whom part of all of our assets or businesses are transferred or sold;
  - (d) our professional advisers, including lawyers, accountants and auditors; and
  - (e) government agencies, regulatory bodies and law enforcement agencies, or other similar entities.
- 8.2 Some of these organisations may be located overseas, or have servers or other data hardware located overseas.

- 8.3 We use the payment platform and processing system, Stripe. Stripe has digital infrastructure in the USA, and stores certain data in on servers located in India. Stripe may collect and use your personal and transaction data and , in accordance with their [Privacy Policy](#).
- 8.4 We use the Articulate360 platform to develop the course. Articulate360 may collect and use your personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles ('APPs). Articulate360 may have access to limited personal information such as name, email address and other information provided at the time of sign-up. Articulate360 will not sell or share personal data outside of their agreement with Tinnitus. More information on how Articulate360 collects and uses personal information can be found in their [Data Processing Agreement](#).
- 8.5 We use TalentLMS as our learning management platform to host the course. TalentLMS has digital infrastructure and servers located in the United States. TalentLMS may collect and use your personal information in accordance with the [TalentLMS Privacy Policy](#).

## **9. DIRECT MARKETING**

- 9.1 We may use your personal information to identify a product or service that you may be interested in or to contact you about an event or promotion. We may, with your consent, use the personal information we have collected about you to contact you via email from time to time to tell you about new products or services and special offers that we believe may be of interest to you.
- 9.2 You can withdraw your consent to receiving direct marketing communications from us at any time by unsubscribing from the mailing list by opening the email received, and clicking on 'unsubscribe' or 'change preferences'.

## **10. SECURITY AND STORAGE**

- 10.1 We store your personal information in hard copy and electronically. We take all reasonable and appropriate steps (including organisational and technological measures) to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.
- 10.2 We only keep your personal information for as long as it is required for the purpose for which it was collected or as otherwise required by applicable laws. If we no longer need to hold your personal information for any reason or we are no longer required by law to keep it, we will take reasonable steps to de-identify or destroy that information. These steps may vary depending on the nature of the information, the way it was collected and how it was stored.

## **11. ACCESS TO AND CORRECTION OF YOUR INFORMATION**

- 11.1 We will endeavour to ensure that the personal information collected from you is up to date, accurate and complete.
- 11.2 You may request access to, or correction of, the personal information we hold about you at any time by contacting us on the details below. We will need to verify your identity before responding to your request. Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time and usually within 28 days. If we decide to refuse your request, we will tell you why in writing and how to complain.

## **12. COMPLAINTS**

- 12.1 You can make a complaint in writing to us using the details set out in this Policy. We will respond to you within 30 days to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.
- 12.2 If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website, [www.oaic.gov.au](http://www.oaic.gov.au).

## **13. CONTACT US**

- 13.1 If you have a question or comment regarding this Policy or wish to make a complaint or exercise your privacy rights, please contact our Privacy Officer on the following details:

Attention: Privacy Officer

Email address: ***info@tuneout.com.au***

Last updated: 12 December 2023