



## Privacy and Data Security Policy

Readiness respects your right to privacy and is committed to safeguarding the privacy of our customers and their data. We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). This policy sets out how we collect, store, process, use and safeguard personal information. Furthermore, we consider the information contained in the platform as medical records, and accordingly, treat the data in accordance with the [Health Records Regulations 2023](#).

This policy relates specifically and exclusively to the SaaS platform services offered by Readiness Pty Ltd (ABN 97 637 630 150), referred to as “we” throughout this document. These services include:

- **Readiness For Business**, located at <https://app.readiness.com.au>
- **Readiness For Schools**, located at <https://education.readiness.com.au>

For the purposes of this document, these sites will be referred to as “**the platform**”. The Privacy Policy relates to the collection and use of personal information you may supply to us through your conduct on the platform.

We reserve the right, at our discretion, to modify or remove portions of this Privacy Policy at any time. Any such changes will be clearly communicated to all users. This Privacy Policy is provided as an addition to the terms and conditions applicable to the platform.

If you have any questions about this policy please contact us at [info@readiness.com.au](mailto:info@readiness.com.au)

### Data Privacy Principles

Our approach to data protection and privacy adheres to the [13 Australian Privacy Principles](#). This privacy policy sets out how we comply with our obligations under the Privacy Act.

As an Australian based organisation, we are bound by the Australian Privacy Principles (APPs) in the Privacy Act which regulate how organisations may collect, use, disclose and store personal information, and how individuals may access and correct personal information held about them.

### Data Collection

We collect your personal information so that we can provide you with access to our platform and the services within.

The platform is a business to business solution. We provide the platform to organisations and schools so that they can provide the underlying services to their employees and students.

In the case of businesses, a master company record is established and your personal information is provided by your employer and includes:

- *first name*
- *last name*
- *year of birth*
- *gender*
- *email address*

and optionally

- *mobile phone number*
- the *location* of your work
- the *division* of the company
- the *department* that you work in
- one or more nominated *advocates* (*links to other user records*)

During the process of using the platform, we capture further information including:

- *survey* questions asked and any *responses* provided
- *messages* send by you to any allocated advocates, including
  - date and time of message
  - message recipient(s)
  - message content
- *messages* sent to you by and other users that you are advocating for, including:
  - date and time of message
  - message recipient(s)
  - message content

We also capture additional information for a range of purpose including infrastructure optimisation, maintaining security systems and system improvements, including:

- login attempts
- location of login
- the date and time of your visit
- the address of the referring site
- the type of browser you are using
- your server's IP address (a number which is unique to the machine through which you are connected to the Internet: usually one of your service provider's machines)
- the address of the pages accessed, and any resources accessed

### Cookies

We may use cookies to provide you with a better experience. A cookie is a small file placed on the hard drive of your computer. These cookies allow us to increase your security by storing your session ID and are a way of monitoring single user access. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting some of the features of the platform will be unavailable to you. Unless you have adjusted your browser setting so that it will refuse cookies, the platform will issue cookies whenever you visit.



## Data Storage and Processing

All information captured on, or provided to the platform is stored, transmitted and used in a secure and encrypted environment at all time in transit and at rest. All information is stored in a secure data centre with 24/7 security using the most sophisticated security mechanisms available. All information is backed up daily into a similarly secured environment.

We use your data, in particular your survey results and resource usage to provide resource recommendations to you. The recommendations are calculated using an algorithm that takes into consideration a number of factors. The factors for each specific set of recommendations are not stored and are therefore not available for review.

## Data Usage

We only use personal information for the purpose which was requested of us, or for the purposes which directly relate to the functions or activities provided by the platform as specifically stated in this document. We will not provide your personal information to other entities or bodies, or any other party unless one of the following applies (as per and in line with APP 6 - use and disclosure of personal information):

- You have consented.
- You would reasonably expect, or have been informed, that information of such kind would be passed on to those individuals, entities or bodies.
- It is otherwise required or authorised by law, or reasonably necessary for the enforcement of a criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.
- It may prevent or lessen a serious and imminent threat to somebody's life or health.

Whilst we capture email address, we do so exclusively for the operation of the platform. Users use their email address to log into the platform, and users can elect to receive transactional communications necessary to provide the service via email. At times we may send product information, relevant exclusively to the ongoing effective usage of the platform.

We also provide the option of allowing users to provide the mobile phone number as a means to receiving transactional information on the platform.

We may at times share elements of the collected data for purely research purposes. This means we would share information about surveys and the results of those surveys, as well as any resources used. This information would include only *gender* and *year of birth*. No other identifiable information is provided. The objective of this research can be many, including:

- to gain insight into the overall wellbeing of the community
- to identifying whether any particular gender or age range requires particular attention
- to understand which resources are most effective in delivering wellbeing uplift
- to identify any industries that require particular focus



We reiterate that it is neither possible to identify a particular user, nor is it desirable. The objective is to understand the bigger picture.

From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at some time in the future we will contact you before we use your data for these new purposes to notify you of the policy change and to provide you with the ability to opt out of these new uses.

### **Who can see my data?**

Aside from yourself, nobody can see your sensitive data unless you specifically authorise them. By “sensitive data”, we mean:

- any surveys completed, including specific responses, topic level and overall results
- wellbeing score over time, at a topic or overall level
- resources viewed
- messages sent or received

The only mechanism by which you can authorise a user is by requesting them as your advocate. The sole purpose of the advocate is to keep track of your wellbeing, including survey results and resultant scores, and being available for messages delivered through the platform. Accordingly, your advocate can see your data. You may have more than one advocate if you choose.

You do not have to have an advocate. It is your choice whether you have an advocate. If you do not have an advocate, nobody will see your data. In such situations, there is a risk to you, as there is nobody actively supporting you and your wellbeing. If you choose to have no advocate, you acknowledge these risks. We will not be held responsible for any negative outcomes in such a scenario.

If you change advocates during the course of your usage of the platform, all messages between yourself and any previous advocates will be retained, but your previous advocate will no longer receive any further messages from you. Your previous advocate will lose all access to all previous surveys and results.

### **Safeguarding of Data**

We take active steps to protect the security, integrity and personal information we hold against loss, unauthorised access, use, modification or disclosure, and against other misuse. We have implemented military grade encryption measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Furthermore, each and every Readiness employee or agent must abide by this policy. While we cannot share with you details of the security systems and procedures we have in place for security reasons, if you have any questions, you can always contact us at [info@readiness.com.au](mailto:info@readiness.com.au).

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to the platform, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.



Unfortunately, the transmission of information via the internet cannot be guaranteed to be completely secure. Although we do our best and take all reasonable steps to protect the personal information you transmit to us through our online products and services, we cannot guarantee the security of your personal information transmitted to or through our Service.

### **Accessing Your Data**

We will endeavour to take all reasonable steps to keep secure any information which we hold about you, and to keep this information accurate and up to date. If, at any time, you discover that information held about you is incorrect, you may contact us to have the information corrected.

The majority of data collected is available directly through the platform. You can:

- manage your own profile
- choose whether you would like to complete surveys
- choose how you would like to be communicated with (if at all)
- see the resources that you have accessed
- see the surveys that you have completed and how you responded to each question
- see any messages that you have sent or received.

You have an right of access to your information stored on the platform. If at any time you would like to see any of the data that is not immediate accessible through the platform, you can contact us on [info@readiness.com.au](mailto:info@readiness.com.au) to request your data. There is a cost of \$400 for this service. If you would like us to delete all of your data, this can also be done at a cost of \$400.

### **Links to external websites**

The platforms may contain hyperlinks to websites not controlled by us, for example through partners and resources. Whilst we make every effort to vet the security of any partners and resources prior to including them on the platform, we cannot and do not provide assurances of the ongoing privacy and information security related to such websites.

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