

LITTLE STARS FOUNDATION

Early Intervention. Lifelong Outcomes.

Privacy Policy

June 2025

1. ABOUT THIS POLICY

- 1.1. This Privacy Policy (**Policy**) applies to Little Stars Foundation Pty Ltd ABN 48 602 704 781 ("**LSF**", "**we**", "**our**" or "**us**"), and describes how LSF collects, handles and protects the privacy of your Personal Information.
- 1.2. ***We work to improve the lives of children and young people living in foster, kinship and residential care through our Little Stars Learners Program.***
- 1.3. We are committed to protecting your privacy and understand the importance of protecting your Personal Information. This 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.
- 1.4. We will handle your Personal Information in accordance with this Policy, legislation including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) and the *Child Protection Act 1999* (Qld) (**CP Act**).
- 1.5. In this Policy:
 - 1.5.1. **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.¹
 - 1.5.2. **Sensitive Information** means:
 - 1.5.2.1. information or an opinion about an individual's:
 - 1.5.2.1.1. racial or ethnic origin; or
 - 1.5.2.1.2. political opinions; or
 - 1.5.2.1.3. membership of a political association; or
 - 1.5.2.1.4. religious beliefs or affiliations; or
 - 1.5.2.1.5. philosophical beliefs; or
 - 1.5.2.1.6. membership of a professional or trade association; or
 - 1.5.2.1.7. membership of a trade union; or
 - 1.5.2.1.8. sexual orientation or practices; or
 - 1.5.2.1.9. criminal record;that is also Personal Information; or
 - 1.5.2.2. health information about an individual; or
 - 1.5.2.3. genetic information about an individual that is not otherwise health information; or
 - 1.5.2.4. biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
 - 1.5.2.5. biometric templates.
 - 1.5.3. **Health Information** means

¹ Personal Information is **de-identified** if the information is no longer about an identifiable individual or an individual who is reasonably identifiable.

- 1.5.3.1. information or an opinion about:
 - 1.5.3.1.1. the health, including an illness, disability or injury, (at any time) of an individual; or
 - 1.5.3.1.2. an individual's expressed wishes about the future provision of health services to the individual; or
 - 1.5.3.1.3. a health service provided, or to be provided, to an individual;
 that is also personal information;
- 1.5.3.2. other personal information collected to provide, or in providing, a health service to an individual;
- 1.5.3.3. other personal information collected in connection with the donation, or intended donation, by an individual of his or her body parts, organs or body substances;
- 1.5.3.4. genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.
- 1.6. This Policy does not apply to the Personal Information of our employees.
- 1.7. We may change this Privacy Policy from time to time, by publishing changes on our website.

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.
- 2.2. We only collect Personal Information that is reasonably necessary for our functions and activities. This includes:
 - (a) Your name, address, email address and phone number;
 - (b) The name of the organisation you work for and your professional title; and
 - (c) Your interests and preferences.
 - (d) Your Health Information, including any relevant medical conditions and reports from your treating medical practitioners.
 - (e) Information relevant to the education of children and young people who participate in our programs including school reports.
- 2.3. If you are applying for a job with us, we may also collect your:
 - (a) Employment history and qualifications;
 - (b) Academic records;
 - (c) References;
 - (d) Medical information;
 - (e) Personal alternative contact details;
 - (f) Superannuation fund details; and
 - (g) Criminal history record.

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.
- 3.3. If you choose not to provide us with some or any of your Personal Information, we may not be able to respond to your enquiry, provide you with the full extent of our services, or offer you employment or volunteer opportunities (as applicable).

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., from our discussions with you, when you complete a form, your emails and your interaction with our website;
 - (b) through third parties with whom we interact in order to provide our services; and
 - (c) publicly available sources, including social media.
- 4.2. If you apply for a job or contract position with us, we may also collect Personal Information about you from third parties and publicly available sources, including:
 - (a) Recruiters;
 - (b) Government departments to verify your entitlement to work in Australia;
 - (c) Police agencies to obtain your criminal history record;
 - (d) Academic institutions;
 - (e) Consulting medical practitioner;
 - (f) Superannuation fund provider;
 - (g) Your current or previous employers; or
 - (h) Your referees.
- 4.3. We will only collect your Personal Information from third parties with your consent, or where it is not reasonable or practicable for us to collect the information directly from you.

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 web pages 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. PURPOSES FOR WHICH WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

- 6.1. We collect, use and disclose your Personal Information for the following purposes:
 - (a) to provide our services;
 - (b) to manage and conduct our business;
 - (c) to offer or promote our products and services;
 - (d) to obtain feedback;
 - (e) to help us manage, develop and enhance our services, including our websites and applications.
 - (f) to consider your suitability for employment; and
 - (g) to comply with our legal obligations, resolve any disputes and enforce our agreements and rights with third parties.

7. HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION

- 7.1. We will use and/or disclose your Personal Information as follows:
 - 7.1.1. for the primary purposes for which the Personal Information was collected;
 - 7.1.2. for a secondary purpose that is related (or for Sensitive Information, directly related) to the primary purpose, and where you would reasonably expect, or we have told you, that your Personal Information will be used or disclosed in that way;
 - 7.1.3. with your consent;
 - 7.1.4. where we are required or authorised by law to use or disclose your Personal Information;
 - 7.1.5. where disclosure will prevent or lessen a serious or imminent threat to the life, health or safety of any individual, or to public health or safety; or,
 - 7.1.6. where the disclosure is reasonably necessary to take appropriate action in relation to a suspected unlawful activity or serious misconduct.
- 7.2. In the course of providing our products and services to you, or after we have provided our products or services to you, we may disclose your Personal Information to:
 - (a) Members of the LSF's group of companies;

- (b) Third parties in order to provide our services, for example to education and wellbeing support companies to assist with provision of education and wellbeing support services;
- (c) Organisations we contract to provide services on our behalf such as software suppliers and mail houses;
- (d) Anyone to whom part of all of our assets or businesses are transferred or sold;
- (e) Our professional advisers, including lawyers, accountants, and auditors; and
- (f) Government agencies, regulatory bodies and law enforcement agencies, or other similar entities.

8. DIRECT MARKETING

- 8.1. 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 from time to time whether by phone, email or SMS, to tell you about new products or services and special offers that we believe may be of interest to you.
- 8.2. You can opt-out of receiving direct marketing communications from us at any time by unsubscribing from the mailing list by emailing us at info@littlestarsfoundation.org.au.
- 8.3. We may also share De-Identified Information, or information about our users and participants that has been aggregated or combined so that it no longer identifies an individual person or other anonymised information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

9. QUALITY OF PERSONAL INFORMATION

- 9.1. We take all reasonable steps to ensure that the Personal Information we collect, use and disclose is accurate, relevant, up to date and complete.

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. DATA BREACH PROCEDURE

- 11.1. A data breach occurs when your Personal Information is accessed, used, modified or disclosed without authorisation, or is lost.
- 11.2. If we discover that there has been actual or suspected data breach, we may contact you to inform you. We will work with you to mitigate the consequences, including harms, resulting from any such data breach.
- 11.3. We are required under privacy laws to notify Government regulators such as the Office of the Australian Information Commissioner about certain data breaches.
- 11.4. Further information relevant to Australia's Data Breach Scheme can be located on the OAIC website at www.oaic.gov.au.

12. ACCESS TO AND CORRECTION OF YOUR INFORMATION

- 12.1. You may request access to, or correction of, the Personal Information we hold about you at any time by contacting our program administrator. 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, or correct, your Personal Information in accordance with your 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.

13. COMPLAINTS

- 13.1. You can make a complaint in writing to our program administrator using the details set out in this Policy. We will respond to you within a reasonable period of time to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.
- 13.2. 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.

14. CONTACT US

- 14.1. If you have a question or comment regarding this Policy or wish to make a complaint or exercise your privacy rights, please contact our Program Manager on the following email: info@littlestarsfoundation.org.au