



MINIBOSS BUSINESS SCHOOL – AUSTRALIA PRIVACY POLICY

1. About this Privacy Policy

Welcome to MINIBOSS Business School – AUSTRALIA. Our website is located at www.australia.miniboss-school.com (“**Site**”).

In this Privacy Policy, “we”, “our,” or “us” or “MINIBOSS” means MINIBOSS Business School - Australia trading under Miniboss Business School (ABN 80 528 790 616). Any reference to “you” or “your” means you, as a parent or guardian (“**Client**”) on behalf of students for the use of our services and where the context applies, in reference to the personal information of a student.

Protecting your personal information is very important to us. When you share your personal information with us, we treat it with care and take our responsibility to protect it seriously. We only use or disclose your personal information for the purpose for which it was collected.

We adhere to the Australian Privacy Principles contained under the Australian Privacy Principles (“**APPs**”) in the *Privacy Act 1988* (Cth), and the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (NDB) (collectively “**Privacy Laws**”).

This Privacy Policy will give you an understanding of:

- (a) the types of personal information we collect;
- (b) how and when we collect, use, store, disclose and otherwise handle personal information;
- (c) the purposes for which we collect, use, and disclose personal information;
- (d) how you may access your personal information;
- (e) how to update your personal information;
- (f) how you can make a complaint and how we deal with any such complaint; and
- (g) how to contact us.

You consent to the collection and use of your personal information as described in this Privacy Policy. If you do not accept our Privacy Policy, please do not access or use our services.

You have the right not to provide us with personal information, but if you do not provide your personal information to us, your user experience, the navigation of our Site and the supply of our services to you may be affected.

Please read this Privacy Policy carefully as it sets out how we collect, store, use and safeguard your personal information in relation to the MINIBOSS Program in compliance with the Privacy Laws.

We may update this Privacy Policy from time to time to reflect changes in how we handle Personal Information and to reflect any changes to the Privacy Laws. Updates to this Privacy Policy will be effective upon posting to the Site.

2. About MINIBOSS

MINIBOSS is a business school delivering its services online and in Brisbane offering business education and entrepreneurship for children and adolescents 6-18 years old (“**Students**”). Upon successful interview with the Student, we offer parents or legal guardians (“**Clients**”) to enrol Students in our business education and entrepreneurship services (“**MINIBOSS Program**”).

3. Personal Information

Personal information means information about an individual whose identity is apparent or can reasonably be ascertained from that information (“**Personal Information**”).

When you access or use our Site or enrol as a Client on behalf of a Student, we may automatically receive, collect, and record Personal Information about you and the Student including through the Site when you:

- (a) sign up or enrol in our MINIBOSS Program; or
- (b) join our Site as a Student; or
- (c) submit an enquiry through our new Student enrolment form found on the Site.

The Personal Information we collect from you is so that we can supply you with our MINIBOSS Program or information about our MINIBOSS Program.

4. What Personal Information is collected?

The Personal Information we collect from you may include:

- (a) name,
- (b) address (town/city, state, post code, country),
- (c) phone,
- (d) email,
- (e) payment data,
- (f) marketing information including social media networks,
- (g) photographs and video recording of Students participating in educational activities,
- (h) photographs and video recording of Clients attending school events; and
- (i) any other information as specified in the Application Form.

We may collect additional information from you at other times, including but not limited to, when you provide marketing information, when you provide feedback, when you respond to our surveys and/or promotions, or communicate with our customer support.

We collect, hold, use and disclose your Personal Information for the purpose of:

- (a) conducting the MINIBOSS Program;
- (b) communication requests;
- (c) contact correspondence;
- (d) inquiries, advice and information;
- (e) access to protected portals on our Site;
- (f) advertising our Site and the MINIBOSS Program;
- (g) internal administrative, marketing and planning requirements;
- (h) in compiling and reporting stats with all the relevant personal and/or proprietary information; and
- (i) to comply with all rules, regulations, laws, lawful and binding determination, decision or direction to a regulator, or in co-operation with any government authority.

When we collect your Personal Information for marketing purposes, it will be in circumstances where you would reasonably expect the data to be used for marketing purposes, and we will always give you a means to “opt out” of any marketing communications.

You also have the option of not providing your Personal Information to us. If you choose to withhold your Personal Information, it may not be possible for us to provide you with our MINIBOSS Program or for us to respond to your query.

If MINIBOSS requests Personal Information about a Student or Client, if the information requested is not provided, MINIBOSS may not be able to enrol or continue the enrolment of the Student or permit the Student to take part in a particular activity.

If it is lawful and practicable to do so, MINIBOSS may offer Clients the opportunity of dealing with the school anonymously or by using a pseudonym. For example, when an individual makes a general inquiry about MINIBOSS.

5. How we collect your Personal Information

MINIBOSS collects Personal Information from you in a variety of ways, including when you interact with us electronically or in person, through customer support on the phone, when we supply our MINIBOSS Program to you, through surveys, by way of forms filled out by Client or Students, or face-to-face meetings and interviews.

You may provide Personal Information to us directly or you may supply it to us digitally when you use our Site.

We may also receive Personal Information from third parties in connection with the supply of our MINIBOSS Program, for example, a report provided by a medical professional or a reference from another school. If we do, we will protect your Personal Information in accordance with this Privacy Policy.

6. How we use your Personal Information

We use the Personal Information collected from you to supply you with our MINIBOSS Program.

We may also use your Personal Information for marketing purposes to make you aware of new products, services and opportunities available to you.

We may contact you by a variety of measures including, but not limited to telephone, email, SMS, mail or social media sites.

We may send you Site-related emails, mobile-phone push notifications and messages. You can opt out of our mailing list if you select the 'unsubscribe' service provided by us in every communication.

MINIBOSS' staff are required to respect the confidentiality of Students' and Clients' Personal Information and the privacy of individuals. MINIBOSS has put in place steps to protect the Personal Information that MINIBOSS holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

7. Sensitive Information

Sensitive information is only collected if it is:

- (a) reasonably necessary for one or more of our functions or activities (the primary purpose), and we have the individual's consent;
- (b) necessary to lessen or prevent a serious threat to life, health or safety;
- (c) another permitted general situation; or
- (d) another permitted health situation.

We may only with your express consent collect information from you that is considered sensitive. You must be adequately informed before giving this consent, you must give this consent voluntarily, the consent must be current and specific, and you must have the capacity to understand and communicate your consent.

We collect sensitive health information from you to provide you with our Services subject to that information being reasonably necessary for the performance of our activities.

In this Privacy Policy, we also explain to you how we store, protect and keep your sensitive information confidential and how and when we disclose it to third parties.

You own your sensitive information and can decide who accesses it and you have a right to access it by asking us for a copy. You can add or delete information or change who has a right to access your records by contacting us.

You can also contact us at any time to request information about the records that we hold about you, to correct any information that we hold about you, to delete any information that we hold about you or to opt out of emails, marketing or any other notifications that you receive from us.

We may share or disclose your sensitive information when your or someone else's health or safety are seriously threatened or when the information will reduce or prevent a serious threat to public health or safety. There are also certain exemptions which may apply in law enforcement situations and in a court of law.

We may ask you to verify your identify before acting on any of your requests.

8. Clients and Students

In relation to the Personal Information of Students and Client, the primary purpose of our collection of Personal Information is to enable us to provide the MINIBOSS Program to Students.

The purposes for which MINIBOSS uses the Personal Information of Students and Clients include:

- (a) to keep Clients informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- (b) day-to-day administration of MINIBOSS;
- (c) looking after Students' educational, social and medical wellbeing;
- (d) helping us to improve our day to day operations including training our staff; and
- (e) to satisfy MINIBOSS' legal obligations and allow MINIBOSS to discharge its duty of care.

9. If MINIBOSS can't collect your Personal Information

If the Personal Information we request is not provided by you, the following may result:

- (a) MINIBOSS Program may not be made available to you;
- (b) MINIBOSS may be unable to deliver its requested MINIBOSS Program to you, including promotional information or offers; and
- (c) we may also be unable to adapt our Site content and experience to your optimum preferences.

10. Disclosure of your Personal Information and Third Parties with access to it

We will share your Personal Information where you have given us your consent in accordance with the purposes described in this Privacy Policy.

MINIBOSS may disclose Personal Information, including sensitive information, held about an individual to:

- (a) another MINIBOSS branch;
- (b) government departments;
- (c) medical practitioners;
- (d) people providing services to MINIBOSS, including tutors, trainers, specialist visiting teachers, counsellors and sports coaches;
- (e) anyone you authorise MINIBOSS to disclose information to; and
- (f) anyone to whom we are required to disclose the information to by law.

Personal Information is only supplied to a third party when it is required for the delivery of our MINIBOSS Program.

We may share your Personal Information with third-party service providers to help us provide our MINIBOSS Program. Our third-party service providers may be located outside of Australia or outside of the EU.

However, MINIBOSS will not send Personal Information without:

- (a) obtaining the consent of the individual (in some cases this consent will be implied); or
- (b) otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

When we disclose your Personal Information to third-party service providers, we do so on the basis that your Personal Information is treated with confidence, and only used for the limited purpose of providing support to our MINIBOSS Program and in manner consistent with this Privacy Policy.

We may from time to time need to disclose Personal Information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our databases, together with any Personal Information and non-Personal Information contained in those databases.

11. International Data Transfers

Subject to and in accordance with the Privacy Laws, your Personal Information may be transferred to our franchiser, "European Bureau For Business Development" LP located in the United Kingdom, Edinburgh. In this event, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your Personal Information remains protected to the standards described in this Privacy Policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those countries may be entitled to access your Personal Information.

You will have the right to withdraw this consent at any time.

12. Security of your Personal Information and Data Breach protocol

MINIBOSS stores personal, sensitive and health Information in a variety of formats including, but not limited to:

- (a) databases;
- (b) hard copy files;
- (c) personal devices, including laptop computers;
- (d) third party storage providers such as cloud storage facilities;
- (e) paper based files; and
- (f) mobile phones, cameras and other recording devices.

We are committed to ensuring that the Personal Information you provide to us is secure. We take practical steps to protect your Personal Information from any loss, misuse, alteration, and unauthorised or accidental access or disclosure or destruction in accordance with our security policy.

To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, technical and managerial procedures, such as encryption of Personal Information, to safeguard

and secure data and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

A reportable “Data Breach” is a security incident where the integrity of Personal Information is compromised through being destroyed, lost, altered, corrupted, disclosed or accessed by an unauthorised person where it is likely to result in serious harm to any individual affected.

We have procedures and systems in place including a data breach incident response plan, specific data breach policies and procedures and personnel to deal with an actual or suspected “Data Breach” and will notify you and the applicable regulator in accordance with our obligations under the Privacy Laws and NDB.

No method over the transmission or storage system is 100% private and secure. You understand that we do not guarantee or warrant the absolute privacy or security of any information we collect from or about you. If you have any questions about privacy or security, please contact us.

Please report any actual or suspected breaches in relation to the MINIBOSS Program or Site for investigation to MINIBOSS by using the contact details provided below.

13. Access to and how you can control your Personal Information

Clients have the right to request access to any Personal Information which MINIBOSS holds about Clients and Students and, in addition, the right to ask us to correct any inaccuracies.

To make a request to access or update any Personal Information the school holds about you or your child, please contact MINIBOSS in writing. MINIBOSS will require you to verify your identity and specify what information you require. MINIBOSS cannot give you information unless we have verified your identity.

Making a request is free. However, MINIBOSS may charge a reasonable fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. The fee will not be excessive, and MINIBOSS will advise the likely cost in advance.

We will allow access or make the changes requested unless we consider the Privacy Act or another relevant law requires us to withhold the information, or not make the changes. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal. If we refuse you access or to correct your Personal Information, you can make a complaint by contacting us directly.

14. Data Ownership

As Students and Clients, you own all right, title and interest in the Personal Information that you provide to us (your “**Data**”). You are solely responsible for the accuracy, quality, legality, integrity, reliability and appropriateness of your Data.

You grant to us a perpetual, worldwide, exclusive, fully paid-up and royalty-free, unlimited, revocable, sub-licensable and transferable licence whilst you are a User of the Site or our services to use, copy, transmit and store your Data in accordance with this Privacy Policy and any agreements you have entered into with us.

We and any related entities own all right, title and interest in any data or information that we create, generate, compile, derive, or produce in connection with the supply of our MINIBOSS Program.

15. Direct Marketing and other Services

Information about our services and direct marketing communications may be sent to you, if we believe this will be of interest to you, through mail, over SMS or email. We will follow any applicable marketing laws in doing so, including the *Spam Act 2003* (Cth). When practical to do

so, we will use your preferred mode of communication. Please remember that you are able to opt-out of receiving marketing communications any time by contacting us, or by using the services provided in the marketing communications. In these circumstances, we will remove your name from our mailing list/subscription.

We will never supply other organisations your Personal Information for direct marketing purposes.

16. Opting-Out

If we use your Personal Information to market and promote our MINIBOSS Program, you may notify us at any time that you do not wish to receive marketing or promotional material by contacting us directly or through the “**unsubscribe**” mechanism in our marketing or promotional emails.

17. Law and Jurisdiction

This Privacy Policy is governed by and construed in accordance with Australian law. You irrevocably submit to the jurisdiction of the Courts of Queensland and any court that may hear appeals from any of those courts for determining any dispute concerning this Privacy Policy and waive any right you may have to claim that those courts are an inconvenient forum.

18. Complaints

If you think we have breached the Privacy Laws or wish to make a complaint about the way we have handled your Personal Information or other information connected to your Account or if you have any questions or concerns about our collection, use or disclosure of your Personal Information, please contact us using our details provided below.

19. Contact Us

You can contact us:

- (a) by post at PO Box 15189, City East, QLD 4002;
- (b) by telephone at 1300 12 42 62; or
- (c) by email at office@miniboss-school.com.au

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