

SCREEN WELL – Privacy Policy

1. Introduction

- 1.1. In this Policy, **Screen Well, we, our** or **us** is a reference to a business owned and operated by Ben Steel ABN 71 334 073 034.
- 1.2. **Personal information** is any information about **you** where **your** identity is apparent, or can reasonably be ascertained, and may include Sensitive Information (defined below).
- 1.3. **Sensitive Information** is information or an opinion about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, sexual preferences, health or medical information or criminal records.
- 1.4. We do not solicit nor knowingly collect Personal Information from individuals aged under 18.

2. What this Policy is about

- 2.1. This Policy explains the key measures we have taken to implement the requirements of the *Privacy Act 1988 (Act)*, the Australian Privacy Principles and where applicable, other data protection laws such as the European Union General Data Protection Regulations (**GDPR**). This Privacy Policy outlines the Personal Information collection practices utilised by Screen Well, how that information is collected, used and disclosed and your rights in relation to your Personal Information.
- 2.2. This Policy covers Personal Information collected directly from individuals who access information and content through our website at www.screenwell.com.au (**Website**) or attend workshops run by us (**Screen Well Workshops**).
- 2.3. We endorse fair information handling practices and uses of information in compliance with our obligations under the privacy laws in force in Australia from time to time. Any information provided, including identification of individuals, will be used only for the purpose(s) intended and where the intention includes confidentiality, information will be treated as such unless otherwise required by law.
- 2.4. This Policy represents the default position that Screen Well will take in its treatment of Personal Information. Screen Well will treat all Personal Information in a manner consistent with this Policy unless you have provided your express consent otherwise.
- 2.5. If there is any inconsistency between the Act and this Policy, this Policy shall be read and interpreted to comply with the Act.

3. Other Policies and Terms and Conditions

- 3.1. Your use of our website is also subject to our terms and conditions. The terms and conditions for your use of our Website may be found here: <https://screenwell.com/terms-conditions>

4. Underage User information

- 4.1. We do not intentionally collect any information from users under the age of 18 (**Underage Users**) and we will never intentionally or knowingly, share or use the Personal Information or Sensitive Information of Underage Users.

- 4.2. If you believe your child has provided Personal Information or Sensitive Information and wish that for it to be deleted, please contact our Privacy Officer, details of which are set out in clause 12.3 of this Policy, and we will delete it within three (3) business days.

5. Collection of Personal Information

- 5.1. Screen Well collects the following Personal Information:
- Personal Information about you, which you provide to us when you access the Website or register for a Screen Well Workshop, which may include your full name, address, email address, contact number and industry role/ title.
 - Personal Information about our employees, contractors and job applicants, including name, address, contact details and work experience.
- 5.2. We may collect Sensitive Information from time to time as required, including information related to your racial or ethnic origin and to the extent of that you provide us with information related to your mental health and wellbeing. We will not collect Sensitive Information without your express consent.
- 5.3. Personal Information and Sensitive Information will be typically collected when provided directly to Screen Well by you:
- when you contact us through our Website or by email;
 - when register interest to attend Screen Well Workshops through our Website;
 - when you complete a request for information form on our Website;
 - during phone calls or other communications between you and us; and
 - when you contact or communicate with us by any other means.
- 5.4. Our Website automatically collects anonymous usage data about visitors, including the URL that the visitor came from, the browser being used and the IP address. This data is utilised to improve the services of Screen Well and does not include any personally identifying information.
- 5.5. Screen Well also reserves the right to collect anonymous usage data through other websites and online systems in order to provide our users with a better user experience. This data does not include any personally identifying information.
- 5.6. 'Cookies' are alphanumeric identifiers that are stored by the web browser on a computer's hard-drive that enable our system to recognise a visitor to our Website. This helps Screen Well to track basic visitor information for the purposes of optimising the design of our systems and marketing activities.
- 5.7. Most web browsers automatically accept cookies and this function can be disabled by changing the browser settings of the user.
- 5.8. Please note that the Website may contain links to other websites which are not hosted or operated by Screen Well. Screen Well is not responsible for the privacy policies of such other websites and you should independently review the privacy policies on such websites.

6. Use of Personal Information

6.1. Screen Well uses Personal Information in the following ways:

to assist us in providing Screen Well Workshops and updated content on our Website to you;

- to contact you with information about the Website and Screen Well Workshops via a third party marketing and email provider, Mail Chimp (<https://mailchimp.com/>);
- to understand how the Website and Screen Well Workshops are performing and which sections of the industry are using the resources; and
- for our own internal administration purposes.

6.2. We may also use Personal Information we collect for related purposes such as:

- to record information about your usage, preferences and behaviour in relation to the Website and Screen Well Workshops, as well as any feedback provided by you;
- when combined with the de-identified Personal Information of other users (in which case such combined information will no longer be personal) to analyse and develop products and services that suit our users;
- to perform statistical analyses of user behaviour;
- to optimise marketing activities, user experience, and content;
- any other use for which we obtain permission from you.

6.3. We do not pass on any Personal Information to a third party except in accordance with this Policy.

6.4. As a user of the Website and attendee of Screen Well Workshops, you may occasionally receive email, promotional material or other updates from us about new information, briefings or products or services being offered by Screen Well or any of its related companies or business partners, along with newsletters and any noteworthy changes to the Website. These communications will be provided to you via Mail Chimp. You may always unsubscribe and opt out from receiving these promotional/marketing update messages.

7. Disclosure of Personal Information

7.1. Other than disclosure to service providers (explained below) or as required by law, our policy is that we do not give Personal Information to other organisations unless we have disclosed the use in this Policy or you have expressly consented for us to do so.

7.2. The parties we may share Personal Information with are employees, service providers such as Mail Chimp, suppliers and affiliates of Screen Well on a need to know basis to allow the provision of the Website and Screen Well Workshops to you. We may also disclose your Personal Information to our Website host, developer or service providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner. Access to Personal Information by these people is subject to such people protecting your Personal Information to at least the degree set out in this Policy, and such access will be revoked within a reasonable timeframe of access no longer being required.

7.3. We may share de-identified information to clients of Screen Well in circumstance where clients have provided funding and other initiatives for the Website and

Screen Well Workshops. Should this occur, we will not disclose identifiable Personal Information without your express consent.

7.4. Occasionally, Screen Well might also use Personal Information for other purposes or share Personal Information with another organisation because:

- we believe it is necessary to protect your rights, property or personal safety;
- we believe it is necessary to do so to prevent or help detect fraud or serious credit infringements - for example, we may share information with credit reporting agencies, law enforcement agencies and fraud prevention units; or
- we believe it is necessary to protect the interests of Screen Well – for example, disclosure to a Court in the event of legal action to which Screen Well is a party.

7.5. When we share information with other organisations and service providers as set out above, we do so in accordance with this Policy. To the extent that these organisations and service providers gain access to Personal Information, their use is governed by their own privacy policies, the Act, GDPR and any other relevant law.

8. Confidentiality and Data Security

8.1. All Personal Information collected is stored on secure cloud Google Drive servers based in Australia or local hard drives located in Queensland and Sydney.

8.2. We take all reasonable steps to manage data stored by us to ensure data security and to prevent the loss, misuse or alteration of Personal Information, including encryption and two-step verification requirements enabled on Google Drive and All files uploaded to Google Drive or created in using Google Drive programs are encrypted in transit and at rest with AES256 bit encryption.

8.3. Notwithstanding the above, Screen Well is not responsible for any third-party access to Personal Information as a result of:

- interception while it is in transit over the internet;
- an unpatched vulnerability, a zero-day vulnerability, or an attack within 48 hours of a vendor releasing a patch or update;
- spyware or viruses on the device (such as a computer or phone) from which you access our Website or otherwise contact us; or
- as a result of your failure to adequately protect your username or password (if applicable).

8.4. Screen Well is also not responsible for any losses, expenses, damages and costs, including legal fees, resulting from such third-party access.

8.5. If we have reasonable grounds to believe that your Personal Information that we hold may be subject to unauthorised access or disclosure (**eligible data breach**), we will investigate and assess the suspected eligible data breach to determine whether the eligible data breach is likely to result in serious harm to you (**Notifiable Data Breach**). If a Notifiable Data Breach occurs, then we will notify you and the Australian Information Commissioner as soon as practicable after we become aware of the Notifiable Data Breach in accordance with our obligations under the Act. We will comply in every way with our obligations under Part IIIC – “notification of eligible data breaches” of the Act.

9. Retention and Disposal of Personal Information

- 9.1. We will retain Personal Information for as long as is required for us to fulfil the purposes for which the Personal Information was collected, including where applicable to provide you with the Website and the Screen Well Workshops and to comply with legal requirements. For the avoidance of doubt, we will hold Personal Information for not longer than 3 years and 6 months after the date of collection, unless we are required or requested to hold Personal Information longer.
- 9.2. If we no longer require Personal Information for any purpose, including legal purposes, we will take reasonable steps to securely destroy or permanently de-identify the Personal Information.

10. Access to Personal Information

- 10.1. You can access the Personal Information held about you at any time by contacting our Privacy Officer.
- 10.2. We will always endeavour to meet requests for access. However, in some circumstances we may decline a request for access. This includes the following circumstances:
 - we no longer hold or use the information;
 - providing access would have an unreasonable impact on the privacy of other persons;
 - the request is frivolous or vexatious;
 - the information relates to existing or anticipated legal proceedings and would not normally be disclosed as part of those proceedings;
 - providing access would be unlawful;
 - providing access would be likely to prejudice the detection, prevention, investigation and prosecution of possible unlawful activity; and
 - the information would reveal Screen Well's commercially sensitive information.
- 10.3. If we decline a request for access, we will provide reasons for our decision when we respond to the request.
- 10.4. We reserve the right to charge you a reasonable fee for access to your Personal Information. These charges will be limited to the cost of recouping our expenses for providing you with your Personal Information, such as document retrieval, photocopying, labour and delivery.
- 10.5. Despite anything contained in this Policy to the contrary, if the *Freedom of Information Act 1982* applies to a person on whose behalf we hold Personal Information, the access and correction requirements in the Act operate alongside and do not replace other informal or legal procedures by which an individual can be provided access to, or correction of, their Personal Information.

11. Changing or deleting Personal Information

- 11.1. We will take reasonable steps to ensure that Personal Information is accurate, complete and up-to-date at the time of collecting the Personal Information from

you, using or disclosing the Personal Information, or during other interactions with you or suppliers in accordance with this Policy.

- 11.2. If you believe that any Personal Information that we hold about you is inaccurate, incomplete or out-of-date, you may contact our Privacy Officer.
- 11.3. We will do our best to correct any Personal Information that is inaccurate, incomplete or out-of-date or dispose of it in accordance with this Policy.

12. Contact Information and Changes to Privacy Policy

- 12.1. If you have any further queries relating to Screen Well's Privacy Policy, please contact our Privacy Officer. If Screen Well becomes aware of any ongoing concerns or problems with your Personal Information, we will take these issues seriously and work to address these concerns.
- 12.2. If you have a complaint in relation to the way your Personal Information has been handled by Screen Well, the complaint should be made in writing to our Privacy Officer in the first instance. Screen Well will investigate the complaint and prepare a response to you in writing within a reasonable period of time.
- 12.3. Our Privacy Officer can be contacted by:
Email: info@screenwell.com.au
- 12.4. From time to time, our policies will be reviewed and may be revised. Screen Well reserves the right to change this Policy at any time.

This Privacy Policy was last updated in March 2022.