

## PRIVACY POLICY

### 1. OBJECTIVES OF SPROUT

Cook SA Pty Ltd (ACN 149 426 880) ("**Sprout**") is a cooking school, education and catering business. In this policy, the terms 'we', 'us' and 'our' refer to Sprout. The terms 'you' and 'your' refer to people whose personal information Sprout may collect.

Sprout is required to comply with the *Privacy Act 1988* (Cth) ("**Privacy Act**"), including the Australian Privacy Principles ("**APPs**") when handling personal information, including health information. Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable. It does not matter if this information is true or not, or if the information or opinion is recorded in material form or not.

The APPs govern the way in which we collect, use, disclose, store, secure and dispose of personal information. A copy of the APPs may be obtained from the website of The Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

By using our website and/or providing your personal information to us, you acknowledge and consent to us using your personal information in accordance with this Privacy Policy.

### 2. POLICY

#### 2.1. Collection of personal information

We collect information about you that is necessary to perform the functions and activities of Sprout. The personal information we collect may be:

- (a) from you directly;
- (b) by telephone or email;
- (c) via our website <https://app.sprout.edu.au/> ("**Website**");
- (d) via the Sprout app ("**Application**");
- (e) and from other publicly available sources and from third parties such as business partners and other providers.

When collecting your personal information, we take reasonable steps to provide you with certain information as required under the APPs, including purpose of collection, the types of organisations or people to whom we may disclose your personal information, any law that requires or authorises us to collect the information and the main consequences if we do not collect all the personal information we require.

#### 2.2. Information we collect

The personal information we collect about you includes:

- (a) name, and contact details (such as addresses, email addresses, telephone numbers etc);
- (b) payment details;

We may also collect other personal and sensitive information from you including information about your attitudes, beliefs and behaviours. The expression 'sensitive information' includes information about your health (see below).

We also collect data about you but which individually does not identify you, such as traffic data, logs, referring/exit pages, date and time of your visit to our Website or use of our Application, error information, clickstream data, and other data and resources that you access and use on the Website or through our Application and other information collected through cookies and other tracking technologies, as well as information about the equipment or devices that you use to access our Website or use our Application and usage details.

### **2.3. Cookies**

We may use "cookies" on our Website and Application for the purposes of managing and improving our Website, improving our business functions, and gathering demographic information about the persons who visit our Website, among other things.

A cookie is a small text file that we may place on your computer or device and is usually used as a means for our Website and Application to remember your preferences and are designed to improve your experience of our Website and Application. Cookies may collect and store personal information about you.

We use cookies for the purposes of managing and improving our Website, improving our business functions, and gathering demographic information about the persons who visit our Website, among other things.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

If you disable the use of cookies on your web browser or remove or reject specific cookies from our Application, Website or linked sites then you may not be able to gain access to all the content and facilities available on or through our Website or Application.

### **2.4. Use and disclosure of your personal information**

We will use and disclose your personal information for the purpose for which we collected it, for other related purposes that you would reasonably expect, and as otherwise permitted or required by law. Generally, these purposes will include:

- (a) to provide our products, services or information to you;
- (b) to present our Website and Application and its contents to you;
- (c) to process, fulfill, support, and administer transactions and orders for products and services ordered by you;
- (d) to provide you with notices about your Sprout account;
- (e) storing information for future reference by you;

- (f) conducting an audit of the data held for research purposes to determine any identified issues and to investigate those issues;
- (g) undertaking surveys to improve our products and services;
- (h) to manage and respond to correspondence and enquiries from you, or third-party individuals and organisations with your consent if the data provided can identify you;
- (i) to provide you direct marketing offers, such as promotions, products and services provided or offered by us or on our behalf, or other service providers who have a relationship with us, that we consider may be of interest or benefit to you. Direct marketing material may be brought to your attention by various means and includes being sent through an email or text message, mail and/or by telephone. When you sign up to our products and services, you consent to receiving marketing material for an indefinite period.
- (j) to fulfill any other purpose for which you provide it;
- (k) to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- (l) to notify you about changes to our Website, our Application, or any products or services we offer or provide through them;
- (m) in any other way we may describe when you provide the information; and
- (n) for other purposes with your consent.

We collect personal information for the primary purpose of providing our services, providing information to our customers, and marketing. We may also use personal information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting by clicking the unsubscribe at the bottom of these communications.

When we collect personal information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it, if this is for a purpose other than the primary purposes described above.

We will not sell your contact details or add your contact details to mailing lists of third parties, without your prior consent. We may disclose your personal information to our agents and third-party contractors who provide services to us. We will require our agents and third-party contractors comply with the APPs.

We may disclose your personal information to third parties in other countries such as United States of America, United Kingdom. We will only disclose personal information to a third party who is not in Australia if we reasonably believe that the recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the APPs protect the information and there are mechanisms which the individual can access to take action to enforce that protection of the law or binding scheme.]

We may also disclose your personal information where required or authorised by law.

**By providing us with your personal information or allowing us to collect your personal information, you consent to us using your personal information for these purposes.**

## **2.5. Sensitive information**

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

We will only collect sensitive information with your consent.

Sensitive information will only be used by us for the purpose for which it is collected or directly related to a secondary purpose (e.g., providing you with results of the survey you have participated in and contacting you in the future about similar surveys) and as otherwise permitted by law.

We may also disclose your sensitive information to third parties who are part of the Sprout team, your employer, training and employment agencies or research project team.

## **2.6. Security of your personal information**

We will take reasonable steps to hold personal information in a manner which is secure and protected from unauthorised access. Reasonable, industry-standard steps are taken to protect personal information from unauthorised access, modifications or disclosure, or from other types of misuse, interference and loss.

Your personal information may be retained in our IT system back-up records until your personal information is no longer required. We will take all reasonable steps to destroy or permanently de-identify your personal information when it is no longer required for the purpose that it was collected. We may retain your personal information so that we are able to contact you again, and as long as necessary to comply with our internal processes, any applicable law, regulations and codes. We will keep your personal information for as long as your account remains open.

The transfer of data over the internet can be insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via our Website, the Application or via email.

## **2.7. How to seek access to and correction of personal information**

You have the right to access personal information about you held by us to the extent permitted by the APPs. You also have a right under the Privacy Act to request we correct your personal information.

You may lodge a request to correct your personal information that we hold about you if you believe that information is inaccurate, incomplete, out-of-date, irrelevant or misleading. You may also lodge a request to access the personal information that we hold about you for any reason.

You must direct any request to the Sprout Privacy Officer via the contact details below. We may charge a fee for providing access, which will not exceed our reasonable expenses incurred in responding to your request, including photocopying and other administrative expenses.

### **3. CHANGES TO OUR PRIVACY POLICY**

We reserve the right to amend, modify or replace this policy at any time. However, we will review it at least once every two years. If we update our privacy policy, we will inform you via an alert on our Website and via an e-mail, if we have your e-mail address. We encourage you to review our privacy policy each time you visit our Website, use our Application or provide us with personal information.

### **4. MAKING A COMPLAINT**

You can get in touch with the Sprout Privacy Officer (using the details under the 'Contact Us' section) if you have an enquiry or complaint about our handling of your personal information. We will confirm receipt of your enquiry or complaint and advise you of the time frame we require to investigate your enquiry or complaint and provide you with a response.

You may also make a complaint directly to the Office of the Australian Information Commissioner via the details below:

Phone: 1300 363 992  
Address: GPO Box 5218, Sydney, NSW 2001  
Online: [online privacy complaint form](#)

### **5. CONTACT US**

If you would like further information, or if you have an enquiry or complaint, please contact the Sprout Privacy Officer using the details below:

Telephone: 08 8443 4343  
E-mail: [app@sprout.edu.au](mailto:app@sprout.edu.au)  
Post: 89 Sir Donald Bradman Drive  
Hilton SA 5033