

ALEX MAKES MEALS – PRIVACY POLICY

Last updated: 21st October, 2021

We have developed this privacy policy to inform you of how Alex Makes Meals Group Ltd ("**we**" "**us**" or "**our**") will collect, hold, use, and disclose personal information.

We are committed to complying with the privacy provisions of applicable legislation including the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (**Privacy Act**). This privacy policy explains how we handle personal information relating to individuals, so as to ensure we meet our obligations under the Privacy Act.

By electing to make a donation, acquire our services, volunteer with us or by otherwise providing us with your personal information (whether via our website or otherwise) you are deemed to be consenting to this privacy policy, including our collection, use and disclosure of your personal information in accordance with its terms.

For the purpose of this privacy policy:

(a) "personal information" means:

Information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (i) *whether the information or opinion is true or not; and*
- (ii) *whether the information or opinion is recorded in a material form or not.*

(b) "website" means: <https://www.alexmakesmeals.com>.

Types of information we collect

We only collect personal information to the extent that this is reasonably necessary for one or more of our functions or activities. The types of personal information we may collect include:

- (a) **if you are an employee or volunteer:** your name, telephone number, address, email address, date of birth; evidence of qualifications and other forms of identification (such as a driver's licence or passport) and details of your emergency contacts;
- (b) **if you are a client:** your name, telephone number, address and email address and details of your emergency contacts; and
- (c) **if you are a donor:** your name, telephone number (where applicable), email address and information linked to your PayPal account including your address and date of birth.

We may also collect sensitive information, in particular, health information. Health information is sensitive personal information that includes information or opinion about:

- (a) your health or a disability (at any time); or
- (b) a health service provided or to be provided to you

Method of Collection

Our preference is to collect personal information from you unless it is unreasonable or impracticable for us to do so. In some cases, we may collect your personal information from public sources and other third parties.

Information will generally be collected from the following sources:

- (a) **if you are an employee or volunteer:** through your application, your referees or past employers, information you submit via our website and phone calls with you;
- (b) **if you are a client:** through the Australian Charities and Not-for-profits Commission and through our partner organisation Bright Sparq Limited (where applicable); and
- (c) **if you are a donor:** through our online donation form on our website and from third party websites such as PayPal, Facebook and DonorBox.

If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received by other methods.

We will only collect your health or other sensitive personal information in the following circumstances:

- (a) where you have consented to us collecting the information;
- (b) where the collection is required by an Australian Court or Tribunal, or under state or federal legislation;
- (c) where we reasonably believe unlawful or illegal conduct has occurred, that may relate to our charitable activities or functions; and/or
- (d) where the collection is directly related to our charitable activities or functions.

Purposes of collection

Purposes for which we may collect personal information include, but are not limited to:

- (a) recruitment, screening and rostering of volunteers;
- (b) client segmentation and client deliveries;
- (c) contacting volunteers and donors;
- (d) distribution of volunteer and donor newsletters; and
- (e) any other activity required for our business operations.

We will not sell or market your personal information to third parties.

Use and disclosure

We will only use or disclose personal information in accordance with the Privacy Act. As a general rule, we may use and disclose personal information for the primary purpose for which we collected it or for reasonably related secondary purposes within your reasonable expectations including, but not limited to:

- (a) processing orders, delivering meals and dispatching our goods and services which may include disclosure to freight providers, contractors or delivery drivers;
- (b) processing and assessing employment and volunteering applications;
- (c) processing donations;
- (d) contacting volunteers and donors in relation to their volunteering or donation, as applicable;
- (e) rostering volunteers;
- (f) distributing our volunteer and donor newsletters and keeping you informed about our services and other activities we think may be of interest;
- (g) dealing with inquiries, suggestions or complaints (including contacting you for the purpose of assisting us deal with such inquiries or complaints as relevant);
- (h) improving our website and our products and services; and
- (i) where you have consented to an act or practice or in circumstances permitted under the Privacy Act.

Disclosure of personal information to third parties

We may share your personal information with third parties engaged to perform administrative, commercial, technological or other services, responsibilities or functions on our behalf (including our service providers, contractors and business partners) for one or more of the purposes identified above.

Consequences if personal information is not collected

If we are not able to collect your personal information:

- (a) we may not be able to provide the requested services to you, or may not be able to provide the requested services to the same standard or scope that we would typically provide the requested services;
- (b) we may not be able to provide you with information about programs and services that you may want, including information about special events, activities and promotions; and/or
- (c) we may not be able to accept your donation or volunteering application.

We do acknowledge that some people may wish to supply only part of the information requested by an Alex Makes Meals service or program, or use a pseudonym when divulging personal information. We will endeavour to support this request where practicable and lawful.

Direct marketing

We will not use or disclose personal information for the purposes of direct marketing to you unless:

- (a) you have consented to receive direct marketing materials;
- (b) you would reasonably expect us to use your personal details for this purpose and have not opted out of receiving direct marketing materials; or

- (c) we believe you may be interested in the material, but it is impractical for us to obtain your consent.

You can ask to be removed from our marketing/promotional mailing list (or from specific communications) at any time by sending a request to: info@alexmakesmeals.com (or by following the prompts in the relevant communication, where applicable).

Please note that even if you have requested not to receive further direct marketing communications, we may nevertheless continue to provide you with information about changes to our terms and conditions for the supply of goods or services, questionnaires and other factual information. This form of communication is not regarded as "direct marketing" under the Privacy Act.

Storage of data and overseas disclosure

The personal information we hold is either stored on our servers or the servers of third party service providers, located both in Australia or internationally, and at our offices within Australia. We take reasonable steps to protect personal information held from misuse and loss and from unauthorised access, modification or disclosure, for example by use of physical security and restricted access to records.

We will retain your personal information only for the period necessary to fulfil the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law. We will retain personal information submitted in connection with volunteer applications on file for the purposes of assessing re-applications or to contact you in relation to assisting us investigate or resolve incidents, issues or queries.

Some of our business partners and service providers with whom we share personal information as described above may be located outside of Australia. It is not practicable for us to specify in advance the location of every business partner or service provider with whom we deal, however, personal information may be stored and processed in locations including the [United States].

It is possible that information will be transferred to a jurisdiction where you will not be able to seek redress under the Privacy Act and that does not have an equivalent level of data protection as Australia. To the extent permitted by law, we will not be accountable for how these overseas recipients handle your personal information.

By providing your personal information to us, you consent to our disclosure of your personal information to these parties. If you have any concerns regarding the transfer of your personal information overseas please contact us using the details provided below.

Employee records

In accordance with the Privacy Act, this policy does not apply to our acts and practices directly related to a current or former employment relationship between us and an employee, and an employee record held by us relating to the employee.

If, nevertheless, we transfer employee records offshore for any reason, we will comply with cross-border restrictions set out in the Privacy Act which apply to the overseas transfer of personal information.

Data security

We will take reasonable steps to protect the personal information which we hold from misuse or loss and from unauthorised access, modification or disclosure, for example by use of physical

security and restricted access to records. We will destroy or de-identify personal information once we no longer require it for our business purposes.

We will comply with our obligations under the Notifiable Data Breaches Scheme (as described in the Privacy Act) in respect of eligible data breaches. To the extent we are required to notify you of a data breach, we will take all reasonable steps to make you aware of such data breach.

When using our website you should be aware that no data transmission over the Internet can be guaranteed as totally secure. Although we strive to protect such information, we do not warrant the security of any information that you transmit to us over the Internet and you do so at your own risk.

Changes to the Privacy Policy

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website. You may obtain a copy of our current policy from our website or by contacting us on the details below. It is your responsibility to check the website from time to time in order to determine whether there have been any changes.

Access, correction and further information

We will take such steps as are reasonable to ensure that the personal information which we collect remains accurate, up to date and complete.

We will provide you with access to your personal information held by us unless we are permitted under the *Privacy Act* to refuse to provide you with such access. Please contact us via the details below if you:

- (a) wish to have access to the personal information which we hold about you;
- (d) consider that the personal information which we hold about you is not accurate, complete or up to date; or
- (e) require further information on our personal information handling practices.

Email: info@alexmakesmeals.com

There is no charge for requesting access to your personal information but we may require you to meet our reasonable costs in actually providing you with access.

If you consider that the information which we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps, consistent with our obligations under the Privacy Act, to correct that information if you so request.

We will respond to all requests for access and/or correction within a reasonable time. Please be aware that, in order to preserve the confidentiality of your personal information, we require proof of your identity before providing you with access to such personal information.

Complaints

If you have any questions about this privacy policy or wish to make a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, please contact us via the details above. We take all complaints seriously and

any complaint will be investigated by us, and you will be notified of our decision as soon as is practicable after it has been made, usually within 30 days after receipt.

If you remain unsatisfied with the way in which we have handled a privacy issue, we suggest you approach an independent advisor or contact the Office of the Australian Information Commissioner for guidance on alternative courses of action which may be available. The Office of the Australian Information Commissioner can be contacted at:

Mail: GPO Box 5218, Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: <http://www.oaic.gov.au>