

Privacy Policy

Able Australia Services ABN 83 024 339 234 (**Able Australia**) and Mosaic Support Services (Tas) Inc ABN 72 733 048 258 (**Mosaic**) (together, **us, we, our**) take your privacy seriously and is committed to responsible privacy practices.

Please read the following privacy policy (**Privacy Policy**) to understand how we collect, use, disclose, store, handle and protect your personal information. We hope that this will help you make an informed decision about sharing personal information with us. As well as applying to our interactions with you, this Privacy Policy also applies to all information collected through our websites <https://ableaustralia.org.au/> and <https://mosaictas.org.au/> and any other websites, platforms and/or mobile apps we operate.

This Privacy Policy sits alongside our [Terms of Use](#) for the Able Australia website, and any other terms and conditions that apply to the products and services we provide to you.

What is personal information?

In this Privacy Policy, 'personal information' has the meaning set out in the *Privacy Act 1988 (Cth)* (**Privacy Act**). In general terms, personal information is information (whether fact or opinion) about an individual who is identified or reasonably identifiable from that information or other information combined with that information.

Some types of personal information are classified as 'sensitive information' and/or 'health information', which are subject to additional protection under the Privacy Act. Sensitive information may include information about your racial origin and health status. Health information generally means information or an opinion about your illness, injury or disability and may include information about a health-related service you have had or will receive, including specialist reports, test results and appointment details. Health information is also subject to additional requirements under the *Health Records Act 2001* (Vic) and other applicable federal, state and territory legislation.

As a registered National Disability Insurance Scheme (**NDIS**) provider, we are also required to adhere to the requirements under the NDIS Practice Standards on Privacy and Dignity.

What types of personal information do we collect?

The types of personal information we collect about you will depend on the purpose for which the personal information is collected. This can include:

- in the case of clients, customers or their authorised representatives who receive (procure) our services or products – your name, billing address, email address, telephone number(s), payment information (including credit card information or alternative payment method account information), your transaction and billing details and any other personal information which is reasonably necessary for us to undertake our services, including your Medicare number and Centrelink Customer Reference Number. If you have set up Centrepay as a payment method for your services with Mosaic, your information will also be processed through Centrepay (www.servicesaustralia.gov.au/centrepay);
- in the case of customers purchasing products through our online store at www.madebymosaic.com.au or individuals making a donation – your name, billing or shipping address, email address, telephone number(s), payment information (including credit card information or alternative payment method account information which may be processed by our payment gateway providers Ezidebit (<https://go.ezidebit.com/>) (for

donations to Able Australia) and Lightspeed (<https://www.lightspeedhq.com/>) (for purchasing products through Made by Mosaic), and your order details;

- technical information and general analytics, such as web browser type and browsing preferences, Internet service provider, referring/exit pages, date/time stamps, IP address, time zone and geolocation data (if applicable), some of which is collected automatically, arising from your use of our website and/or platforms, as well as information about your usage of our website and/or platforms when browsing (see: "How do we collect personal information" below);
- if you have requested to receive news about exclusive offers, promotions, or events from us – your name, mailing or street address, email address, and telephone number(s);
- if you have contacted us to make a complaint, provide feedback, submit an enquiry, request a call-back – your name, mailing or street address, email address, and telephone number(s);
- in the case of our sites where we have CCTV technology installed, CCTV footage and recordings;
- in the case of prospective volunteers, employees or contractors – information contained in your application or résumé, recorded during any interview, or obtained through any pre-employment checks, and government-issued identifiers such as tax file numbers;
- in the case of volunteers, employees or contractors – information relating to your employment with us (including employee records, as defined under the Privacy Act) or engagement with us as a contractor or volunteer; and
- in the case of our suppliers and distributors – your name, mailing or street address, email address, and telephone number(s).

Your personal information may be processed in accordance with, and we suggest you familiarise yourself with the privacy policies of:

- our payment gateway providers Ezidebit (available at www.ezidebit.com/en-au/privacy-statement) and Lightspeed (available at www.lightspeedhq.com/legal/privacy-policy/); and
- Centrepay (available at www.servicesaustralia.gov.au/using-your-personal-details-for-centrepay and www.servicesaustralia.gov.au/your-right-to-privacy), if applicable.

We collect the following types of sensitive information and health information:

- notes or reports on a client's diagnosis, assessment and treatment (including medications);
- health, therapy and behaviour plans;
- appointment and billing details;
- healthcare identifiers;
- NDIS plan, NDIS identifier and funding information;
- your preferences about the current and future provision of services to you; and

- other personal and health information collected to provide or in providing our services.

We may also collect personal information in relation to treating practitioners or allied health specialists.

We collect personal information, including health information, of individuals under the age of 18 where permitted by law and where their parent or guardian has consented to this collection.

How do we collect personal information?

We collect your personal information directly from you, including when you:

- access or use our websites;
- purchase our products or services (including when you attend appointments or during the provision of support);
- complete forms (such as application, consent and intake forms) or provide supporting documents for the purposes of the provision of our services;
- make a donation;
- sign up to receive news and exclusive offers and promotions, or you attend one of our sites, events, courses or conferences (or register to attend);
- enter surveys, competitions, promotions or request information or material from us;
- make inquiries about us or our products or services or otherwise communicate with us by email, by telephone, in person, via a website or otherwise; and
- apply to work with us or are engaged by us as a contractor or a volunteer.

Where it is reasonable and practicable to do so, we will only collect personal information about you from you directly and not from third parties.

In some circumstances, we may collect personal information about you from publicly available sources (such as the Internet) and from third parties (such as mutual contacts, if someone acquires our services on your behalf, from your referees during the recruitment process if you apply for a job with us and recruitment agencies), through promotional and marketing activities and other relevant third parties. For the purposes of providing our services, we may also collect personal information through third parties such as our service providers, your authorised representative (as defined under section 85(6) of the *Health Records Act 2001* (Vic), such as your parent or guardian), your treating health practitioners and relevant government regulators or authorities.

Whilst we will always maintain robust privacy practices, we are not responsible for the privacy practices of third parties from whom we may receive personal information from, or who may process your personal information, including relevant government regulators or authorities (such as the NDIS, the NDIS Commission, Centrelink and the Office of the Independent Regulator (Tasmania)) and our service providers (such as WordPress, Carelink, MailChimp, Salesforce and TechnologyOne (for information relating to our employees, contractors, and volunteers)). You should review the relevant third party's privacy policy to satisfy yourself as to how they protect and handle your personal information.

Cookies, web technologies and analytics

We also use the following technologies to collect technical information and general analytics:

- cookies, which are data files that are placed on your device and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>;
- log files, which track actions occurring on our website; and
- web beacons, tags, and pixels, which are electronic files used to record information about how you browse our website.

You may disable your web browser from accepting cookies and other tracking technologies used to collect technical information and general analytics when browsing our website. If you do so, you can still access our website, but it may impact your user experience.

In addition to our cookies, certain third parties may deliver cookies to your device for a variety of reasons. For example, we sometimes use various web analytics tools that help us to understand how visitors engage with our website. Any third party links or advertising on our website may also use cookies; you may receive these cookies by clicking on the link to the third party site or advertising. We do not control the collection or use of information by these third parties, and these third party cookies are not subject to this Privacy Policy. You should contact these companies directly if you have any questions about their collection and/or use of information. When linking to any other site, you should always check the relevant website's privacy policy before providing any personal information.

Can you choose not to disclose your personal information?

You do not have to identify yourself or provide any personal information if you contact us. You can also notify us that you wish to deal with us using a pseudonym.

However, if we cannot collect personal information about you or if you use a pseudonym, we may not be able to provide you with the information or assistance you require. For example, we will not be able to send you information you have requested if you have not provided us with a valid email address or telephone number.

How do we use your personal information?

We use your personal information for purposes collected including managing our business and providing our products and services to you, including to:

- provide our products and services to our customers including to assess and process requests for client support services and determine appropriate support requirements (such as for LGBTQIA+, First Nations people, and children and young people's safety);
- undertake activities for the provision of our services, such as booking, billing, processing transactions, updating our records and other "business as usual" activities;
- receive goods or services from third parties;
- enable the proper operation and functionality of our products and services;
- verify your identity (for example, if you request access to the personal information we hold about you);
- consider you for a job with us (whether as an employee or contractor) or other relationships with us (such as volunteers);

- communicate with you, and to address any enquiries, issues or complaints that we or you may have regarding our relationship and our products and/or services;
- prevent, detect and investigate suspicious, fraudulent, criminal or other activity that may cause you, us or others harm, including in relation to our products and services;
- comply with our legal and regulatory obligations such as notifying you of matters that we may be required by law to do so or to report to government agencies, regulators and bodies such as the NDIS, the NDIS Quality and Safeguards Commission, and the Office of the Independent Regulator (Tasmania);
- identify opportunities to improve our products and services and to improve our service to you;
- gain insights about you so that we can serve you better, understand your preferences and interests, personalise your experience and/or enhance products and services you are offered and receive;
- for direct marketing purposes (see "Direct Marketing Communications" below); and
- contact you regarding any of the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

We may also use or disclose your personal information for our administrative, marketing (including direct marketing), planning, product or service development, quality control, survey and research purposes and for other purposes to which you have consented, or as otherwise permitted or required by law.

Technical information and general analytics is used for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are using our website, and to improve our website and our products and services.

To whom do we disclose personal information?

We may disclose your personal information to third parties in connection with the purposes described above (see the "How do we use your personal information?" section).

This may include disclosing your personal information to the following types of third parties:

- our related companies, organisations and associations. This includes the disclosure of personal information between Able Australia and Mosaic (and vice versa), including personal information relating to our clients, employees (such as employee records), contractors and volunteers;
- relevant health professionals, such as your treating health practitioner(s); and other professionals such as Support Coordinators, Guardians, and Financial Administrators
- any potential or actual third party acquirer of our business or assets through any corporate restructuring, merger, acquisition or takeover, and advisors to that third party;
- our professional advisers (such as lawyers, accountants or auditors) and insurers;
- our employees, contractors and third party service providers who assist us in performing our functions and activities e.g. payment systems operators and financial institutions, software providers (such as WordPress, Salesforce, Technology1, MailChimp and

Carelink) cloud service providers, data storage providers, shipping companies, telecommunications providers and IT support services providers;

- state, federal or regulatory agencies or authorities where required, including for the purpose of mandatory reporting for incidents of violence, exploitation, neglect, abuse or sexual misconduct to the NDIS Commission, state or federal police, the Strong Families Safe Kids Advice and Referral Line (Tasmania) and the Office of the Independent Regulator (Tasmania);
- emergency services such as police or ambulance;
- organisations authorised by us to conduct promotional, research or marketing activities;
- third parties to whom you have authorised us to disclose your information (e.g. Support Coordinators, referees or account nominees); and
- any other person as required or permitted by law.

We use third party service providers to provide us with web analytics services, such as Google Analytics. You can read more about how Google uses your personal information at Google's [Privacy Policy](#), [Privacy controls in Google Analytics](#) and [Safeguarding your Data](#) webpages. If we disclose your personal information to third parties we will use reasonable commercial efforts to ensure that such third parties only use your personal information as reasonably required for the purpose of disclosure and in a manner consistent with applicable laws, for example (where commercially practical) by including suitable privacy and confidentiality clauses in our agreement with a third party service provider to which we disclose your personal information.

Direct marketing communications

We will only send you direct marketing communications (either through mail, SMS or email), including any news and exclusive offers, promotions, or events, where you have consented for us to do so.

You may opt-out of receiving direct marketing communications at any time by contacting us or by using opt-out facilities provided in the direct marketing communications.

How do we store personal information?

We store your personal information in paper-based files and other electronic record keeping methods in secure databases. Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We do not combine or link personal information we hold about you with other personal information about you from third party sources.

Does personal information leave Australia?

Your personal information may be transferred overseas or stored overseas for a variety of reasons. For example, we may disclose your personal information to our service providers located overseas, in order to assist us in providing our products and services.

If your personal information is sent to a recipient in a country with data protection laws which are at least substantially similar to the Privacy Act and the Australian Privacy Principles, and where there are mechanisms available to you to enforce protection of your personal information under that overseas law, we do not require the overseas recipients to comply with the Privacy Act and

the Australian Privacy Principles and we will not be liable for a breach of the Privacy Act or the Australian Privacy Principles if your personal information is mishandled in that jurisdiction.

If your personal information is transferred to a jurisdiction which does not have data protection laws as comprehensive as Australia's, we will take commercially reasonable steps to secure a contractual commitment from the recipient to handle your information in accordance with the Privacy Act and the Australian Privacy Principles.

How do we protect your personal information?

We implement reasonable measures to protect and safeguard your personal information from misuse, loss, theft and unauthorised access, modification or disclosure.

We maintain physical security over paper and electronic data stores, such as through locks and security systems at our off-site hard copy storage sites, and providing training to our personnel regarding managing personal information in accordance with this Privacy Policy. We also maintain computer and network security, for example, we use security measures on our websites, restrict access to authorised users, and use other security systems such as encryption, user identifiers and passwords to control access to our computer systems. Cybersecurity awareness training is also provided to staff.

However, particularly for electronic data stores and due to the fact that the Internet is inherently insecure, we cannot guarantee the security of transmission of personal information disclosed to us online. Accordingly, you transmit your personal information to us online at your own risk and are encouraged to exercise care in sending personal information via the internet. Please notify us immediately if you know or reasonably suspect that your personal information has been subject to any data breach, breach of security or other unauthorised activity.

How long do we keep your personal information?

Generally, we will retain your personal information for the period necessary for the purposes for which your personal information was collected (as outlined in this Privacy Policy) unless a longer retention period is required by law or if it is reasonably necessary for us to comply with our legal obligations, resolve a dispute or maintain security.

When personal information is no longer required, we will take reasonable steps to delete the personal information from our systems or de-identify the personal information.

How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by using our contact details set out in the "How to contact us" section below. We will handle your access request (including taking appropriate steps to verify your identity) and provide access to that information in accordance with the Privacy Act, the *Health Records Act 2001* (Vic) and other applicable federal, state and territory privacy legislation, subject to any exemptions that may apply. We may charge an administration fee in limited circumstances, but we will let you know in advance if that is the case.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it by using our contact details as set out in the "How to contact us" section below. Where we agree that the information needs to be corrected, we will update it. If we do not agree, you can request that we make a record of your correction request with the relevant information.

You can also ask us to notify any third parties that we provided incorrect information to about the correction. We'll try and help where we can - if we can't, then we'll let you know.

Questions or complaints?

If you have any questions, concerns or complaints about our collection, use, disclosure or management of your personal information, please contact us using the details set out in the “How to contact us” section below.

We are committed to resolving any complaints reasonably and to ensuring that we are doing the right thing by our customers. We will make all reasonable inquiries and your complaint will be assessed with the aim of resolving any issue in a timely and efficient manner.

If you have raised a complaint with us and you are unsatisfied with the outcome or have further concerns about the way we handle your personal information, under the Privacy Act, you may complain to the Information Commissioner at the Office of the Australian Information Commissioner, whose contact details are set out below:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Online: www.oaic.gov.au
Email: enquiries@oaic.gov.au

How to contact us

If you have a query, concern or complaint about the manner in which your personal information has been collected or handled by us or would like to request access to or correction of the personal information we hold about you, please contact us using the details provided below, as relevant:

Privacy Officer
Able Australia Services
413 Canterbury Road, Surrey Hills VIC 3127
Phone: 1300 225 369
Online: <https://ableaustralia.org.au/about-us/contact-us/>
Email: privacy@ableaustralia.org.au

Privacy Officer
Mosaic Support Services
PO Box 4658 Bathurst Street PO, Hobart, 7000
Phone: (03) 6244 9444
Online: <https://mosaictas.org.au/contact-us>
Email: feedback@mosaictas.org.au

Changes to this Policy

We may change or update this Privacy Policy from time to time to keep up-to-date with legal requirements and the way we operate our business. An up-to-date version of this Privacy Policy is available at any time on this page. You are responsible for reviewing this Privacy Policy periodically and informing yourself of any changes. We suggest that you check back regularly. If we make significant changes to our Privacy Policy, we will seek to inform you by notice on our websites or by email.

This policy is effective from 17th February 2025

CONTINUOUS IMPROVEMENT - Improvements to this policy can be made by completing an Internal Feedback Form via Tickit.

Document Control *Documents are controlled for version, traceability and security within SharePoint.*