



Privacy Statement

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1. What is the Warren Academy?

Warren Academy (referred to herein as the Academy') is a private educational business for the mental health sector and the broader community. It provides an online platform and courses player (referred to herein as 'the Courses Platform/Player') of Warren Agility Courses (referred to herein as WACs) and the premium coaching programs. The online courses are designed and described as 'mindful emersion experiences' for personal and professional development, self-exploration, and discovery in the topics of individual wellbeing, problems and challenges in living, the lived and living experience (LE) peer workforce, and similar supportive professional development for health professionals.

You can read more about Warren Academy in the information packs provided to you via email when you sign into the Warren Academy's Courses Platform/Player or you can read some more about Warren Academy on the business website (referred to herein as 'the Website') which can be found at:

www.thewarren.academy

2. Warren Academy Commitment to User Transparency

The Academy is committed to protecting your privacy in all ways that it can. The personal information about you that is collected by the Academy during the course of its business including your engagement in face-to-face courses, your use of its Website, and the Courses Platform/Player is dealt with

respectfully, kindly, and in accordance with the *Privacy Act 1988*. Your privacy is deeply respected, protected, and very important to the Academy.

3. To Whom This Statement Applies

This privacy statement applies to all the Website and Courses Platform/Player users whose personal information the Academy may collect during its business of providing emersion experiences (courses and programs). This includes individuals who use the Website and the Courses Platform/Player for personal use, individuals who use them for professional development, individuals who use them for both, and use them for any other reason. This privacy statement also applies to any companies, organisations, and health service providers and this Privacy Statement also applied to any professional or charitable bodies who endorse an employee to use the Website and the Courses Platform/Player, who is doing so in a function that is representative of their employer/organisation.

4. The Information That Warren Academy Might Collect About You

- A. Contact details such as name, age, location, email address, and phone number
- B. Demographics information such as your gender, nationality, ways in which you personally identify (e.g., Migrant, transgender, health service-user etc.)
- C. Marketing data preferences such as your preferences for receiving the Academy's marketing communications, and details about your engagement with those communications
- D. Financial information such as your bank account and credit or debit card details
- E. Any other information that you choose to disclose during your engagement with the Academy

5. What Warren Academy Uses Personal Information For

When creating an academy user account and purchasing a Warren Agility Course on the Academy's courses Platform/Player and during your engagement with a course, the Academy may collect and use personal information about you (and in some cases your personal support person/s or a person you support). The information may be bank account and financial information but may include sensitive information including health information and personal identifiers, this enables the Academy to provide the online and face-to-face experiences (WACs and premium coaching programs) which is the Academy's core business.

Providing some aspects of personal information to the Academy may be optional (applicable in cases such as enrolling in fully funded or FREE courses that do not require the submission of bank account details or for example, choosing not to answer survey questions and utilise the available community groups and forums where people may disclose personal information during the enrolment on your course). In cases where you have permitted us to collect any form of information (for example, simple demographics or more personalized and/or sensitive information) the Academy uses it for the following purposes:

- A. To identify usage trends
- B. To understand our users' needs and interests
- C. To personalize user' online experiences wherever possible and/or relevant
- D. To provide online experiences that meet expectations and purpose

- E. To help the Academy manage its business standards and practices
- F. To comply with our legal obligations
- G. For quality improvement purposes
- H. To communicate about our products, online, and face to face courses
- I. To provide support to our users' and respond to questions, requests, and feedback

6. Why Warren Academy Collects Personal Information

The Academy collects some information about you during your product purchase(s) and/or enrolment onto a WAC or program, primarily to enable the Academy to process your order, for example collecting financial information is necessary to complete a purchase. The Academy may collect personal information from individuals when they are signing up/creating an Academy user account to gain access to the Courses Platform/Player. You may use the Website and/or portions of it and the Courses Platform/Player anonymously or by using a pseudonym (a fake name). However, it may not always be possible to provide you with all aspects of the Academy's offerings anonymously, or by using pseudonyms. In such cases you can contact Warren Academy anonymously to seek further information about options to use certain Academy offerings/products and courses anonymously or by using a pseudonym. The Academy will provide any further information you require to enable you to make personal decisions about how you will engage further with your interests in the Academy's business, the Website, Courses Platform/Player, and/or online stores. You are under no obligation at any time to disclose your real name, aspects of identity, or any other personal information. Please contact us at comsburrow@thewarren.academy to discuss your needs and options if these circumstances apply to you.

In the cases where you provide us with personal information (information about you or another person) and you or that other person is identifiable or in cases where you have authorised another person to provide us with information (applicable in the case of engaging in the case of face-to-face courses with or without your support person) the information will be handled carefully and with respect to privacy by all course facilitators and the Academy.

- i. In the cases where the Academy has obtained some private personal information about you or another person in the manner described above or by another means, then any written, recorded, used, stored information is dealt with consistent with the *Privacy Act 1988*.

In all business cases and for all its online sites, the Academy uses personal information according to business compliance processes and protection for its users. Business compliance includes the following areas:

- A. Enforcing the terms and conditions governing our business; the Website, and the Courses Platform/Player
- B. Audit our internal processes for both legal and contractual requirements, and internal policies
- C. Protect the Academy user's privacy and safety
- D. Complying with the applicable laws, legal requests, and processes, for example, responding to subpoenas or requests from government authorities
- E. Prevent identity theft, investigate, and deter harmful, unethical, fraudulent, unauthorized, or illegal activity including cyber-attacks.

7. Does Warren Academy Disclose Personal Information to Any third Parties?

The Academy does not provide to any other individuals, businesses, companies, health service providers, organizations, third parties, or bodies of any kind, its Academy account users personally identifying information (for example, information stated under section 4. of this privacy statement, and such information that does not fall under the automatic digital data collection covered in section 9) unless the following circumstances apply to the Academy:

- a. The Academy is expressly permitted to do so by the Academy account holder or website user
- b. The Academy is issued with a subpoena requiring the disclosure of personal information
- c. The Academy is requested by applicable legal and government authorities authorized to attain such information and the Academy believes this to be a reasonable request

Information Security

The Academy employs technical, organizational, and physical safeguards designed to protect the personal information of Academy account users that it collects. However, no security measures are failsafe and the Academy cannot guarantee the security of personal information.

In all cases for users of all its online sites, the Academy will take all reasonable steps to determine through appropriate advice whether disclosure might result in some form of harm and/or distress to the individuals the personal information pertains to. In such cases, the Academy will use all reasonable measures and endeavours to object to the disclosure on any legal grounds available to the Academy.

8. How the Academy Accesses or Corrects Personal Information About You

The Academy tries to ensure that the personal information we collect, use, update, and/or disclose is relevant, accurate, complete, and up to date. You can request to access or update personal information that belongs to you only. The Academy will provide only you with the information it has obtained about you. When the Academy has been advised, by you, of incorrect personal information about you, the Academy will take all reasonable steps to amend any personal information it holds about you and communicate and/or evidence this clearly with you and only you.

9. How the Warren Academy Collects and Uses Online Data About You

Automatic Data Collection

Device Data such as computer or mobile device operating system type or version, manufacturer and model, browser type, screen resolution, RAM, and disc size, CPU usage, device type (e.g., phone or tablet) IP address, unique identifiers (including identifiers used for advertising purposes) language settings, mobile device carrier, radio network information (e.g., WiFi, LTE, 3G) and general location information such as geographic location.

Online Activity Data such as pages or screens viewed, how long users spend on a page or screen, the website they visited before browsing to the Academy online sites, navigation paths between pages or screens, information about activity on a page or screen, access times and duration of access, whether users open Academy marketing emails, and whether users click on links contained within the

marketing emails. The Academy may also allow advertising partners to collect this information through our Website.

The Academy uses the following tools for automatic data collection:

- A. Cookies
- B. Local Storage Technologies
- C. Web beacons

These methods are explained a little further below.

When users interact with the Website and the Courses Platform/Player, we strive to make the user experience easy, comfortable and meaningful, in all ways that we can. The Academy may use cookies and similar technology to track site visitor activity and collect user data. Examples of the types of information that the Academy collects are listed below:

- A. Your computers IP address
- B. Your browser type(s)
- C. Products you've viewed or searched
- D. The country you are in
- E. What you have clicked on
- F. What links you visited to get to and from the Academy Website and Course Platform/Player

If we Identify you with this information any use of that information will be dealt with in accordance with this privacy policy.

Cookies

A cookie is a text file that a website transfers to your computer's hard drive for record-keeping purposes. Cookies also record clickstream information (data reporting the URLs or page names that have been visited on a website).

Cookies help the Academy gather and store information about visitors to the Academy's Website and the Courses Platform/Player and they are intended to improve your website browsing experience. Our cookies randomly assign a unique number to each visitor's computer, they do not contain information that would personally identify a person; however, the Academy can associate a person with any personal information that the individual has provided whilst using the Website and the Courses Platform/Player, for example information provided when creating a user account. This will always be the case if a person has created an online Academy account and signed up to a WAC or premium coaching program. The Academy uses cookies that remain on your computer for a specified period for a specified time-period, or until they are deleted (persistent cookies).

The Academy may also use session cookies (cookies that only exist temporarily during an online session). These cookies allow you to log into your user account and enable the Academy to identify you temporarily as you move through the Website and the Courses Platform/Player. Most websites allow users to refuse cookies and the Academy Website has this feature but usually doing so impedes the functionality of some portions of the Website.

Local Storage Technologies

Local storage technologies include things like HTML5 that provide cookie equivalent functionality but can store larger amounts of data including on the device outside the user's browser in connection with specific applications. An application (or app') is a program or a digital space that you can open on a device, many people use them. Companies and organizations like Face Book, After Pay, most banks etc, health insurers, Centrelink and some retailers have a version (an app') of their online services, products, and platforms that you can download for easier usage and interaction with their products and services. You typically need to have a created an account of some type with the provider to use the organisations app on your device.

Web Beacons

Web beacons are also known as pixel tags or GIFs and they are used to demonstrate that a webpage or email was opened, or accessed, or that certain content was viewed or clicked on.

10. Warren Academy Online Site-Users and Third-Party Services

WAC's and premium coaching programs contain links to other companies, businesses, organizations, bodies, and/or services that are not associated or affiliated in any way with the Academy. These links and/or integrations of any kind are not an endorsement of or a representation that Warren Academy is affiliated or connected in any way with any third parties. The Academy does not control websites, services (professional or otherwise) operated by third parties and the Academy is not responsible for actions taken by any third parties.

Warren Academy Website, Courses Platform/Player, and Online Store Analytics

The Academy may engage third parties, such as Google Analytics, to track and analyse activities on its online sites on our behalf. To do so, these third parties may use cookies or web beacons to tack the activity data that the Academy needs to analyse. The information generated by these cookies (such as your truncated computer IP address) is transmitted to and stored by Google and other third party providers, on servers in the United States of America. Google may use this for the purposes of evaluating user's activity, and use of the Academy's business Website and the Courses Platform/Player and their mobile versions. Analytics involves compiling reports for the Academy regarding its Website and the Courses Platform/Player's activity and usage details. The reporting may include other services that help the Academy understand it's online site activity.

You can opt-out of Google Analytics by downloading and installing the browser plug-in available at: <https://tools.google.com/dlpage/gaoptout>

11. Warren Academy Suggestions for Online Site-Users Advancing Their Privacy Online

The following are suggestions to increase your privacy online:

- A. **Viewing and using online sites in a private browser or in incognito mode.** For more information on device and online safety including using any site please visit: https://www.1800respect.org.au/help-and-support/technology-and-safety/general_online_safety

and <https://www.1800respect.org.au/help-and-support/technology-and-safety/devices>

- B. **Blocking cookies on your browser.** Most websites allow you to accept or remove/reject cookies including those used for internet-based advertising. Many browsers accept cookies by default until you manually change your browser settings. You can do this by opening your browser settings and following the instructions. For more information about cookies including how to see information about what cookies have been sent to your device(s) and how to manage or delete them, you can visit: www.allaboutcookies.org
- C. **Blocking advertising ID use in your mobile settings.** You may be able to limit the use of the advertising ID associated with your mobile device(s) for internet-based advertising purposes.
- D. **Using privacy plug-ins or browsers.** You can use a browser with privacy features, for example Brave or you can install browser plug-ins such as Privacy Badger, Ghostery, or uBlock Origin. You then configure them to block third parties' cookies and trackers etc.
- E. **Opting out of platforms.** Some advertising partners offer opt-out features that enable you to choose not to allow your information to be used for advertising by participating companies and organizations. You can try Google: adsettings.google.com

Please note: These opt-out mechanisms are specific to the device being used. You will need to opt-out on every device and browser that you use.

12. Children

The Academy Course Platform/Player and online stores are **not intended for use by children** under the age of 18 years old. If the Academy learns that it has collected personal information about a person aged under 18 years old, without the consent of the child's parent or legal guardian, as required by law, the Academy will delete it expediently.

13. Retention

The Academy retains personal information about account users for as long as it needs to fulfil the purposes for which the information was obtained.

The Academy will not keep transcripts and/or records of any kind of the comments made by users in the online courses associated chat forums, community groups internal or external to the Courses Player, nor any sensitive emails or documentation it has acquired and/or created pertaining to any of its online site users.

The Academy will not keep any records of personal information after users' disengagement with the Academy, for example when users opt out of receiving communications from users unless required for the following purposes:

- A. For any purposes of completing or satisfying any legal or financial accounting,
- B. To establish or defend any legal claims, or to support fraud prevention purposes.

To determine the appropriate retention period for personal information, the Academy considers the amount, nature and sensitivity of the information collected and held and the consider the potential of such information to be used harmfully and or without authority. The Academy also considers how it is processing and using the personal information and whether those purposes can be achieved through any other means or processes whilst maintaining any applicable legal obligations.

14. Changes to this Privacy Statement

The Academy reserves the right to modify this policy at any time. When the Academy makes material changes to this Privacy Statement, we will provide the Website and the Courses Platform/Player with the Academy's latest version of this Privacy Statement. The date of amendments or the latest version are included at the end of the document. This Privacy Statement can be found at the footer of the Courses Platform/Player and on the About Us page of the Website. It is a downloadable document in both online destinations.

15. How to Contact Warren Academy

If you have any comments or questions relating to these Terms you may contact the Academy by:

- i. Email at comsburrow@thewarren.academy
- ii. The contact form in the 'Contact Us' tab on the Warren Academy business website
<http://thewarren.academy/contact.html>

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