



Eb·Flow·Grow
NURTURE THROUGH NATURE

Privacy Policy

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Introduction

Eb Flow Grow Ltd ABN 23 694 251 717 (the Foundation, we, us, our) is committed to protecting the privacy of the personal and health information it collects and holds. The Foundation handles health information in accordance with the Health Records Act 2001 (Vic) and the Health Privacy Principles. It also seeks to manage all personal information consistently with the Australian Privacy Principles as a matter of good practice and complies with the Privacy Act 1988 (Cth) where that Act applies.

This policy explains:

- the kinds of personal and health information the Foundation collects and holds;
- how the Foundation collects, uses and discloses that information;
- how the Foundation protects and retains that information; and
- how individuals may access or correct their information or make a privacy complaint.

The Foundation may update this policy to reflect changes to the law, technology or its operations. The current version will be published on the Foundation's website and material changes will be communicated to affected individuals where appropriate.

Scope

This policy applies to children and their parents, guardians or authorised representatives (Parents); donors and supporters; directors, committee members and volunteers; schools and allied health professionals; experience providers and other contractors; event participants; website users; and other people who interact with the Foundation.

Definitions

In this policy:

Personal Information means information or an opinion about an identified individual or an individual who is reasonably identifiable.

Sensitive Information is a category of Personal Information that includes health and genetic information, information about racial or ethnic origin, religious or philosophical beliefs, sexual orientation, criminal records and certain biometric information.

Health Information includes information or an opinion about an individual's physical or mental health, disability, health services or other matters treated as health information under the Health Records Act 2001 (Vic).

We will only:

- collect Personal Information where it is reasonably necessary for the Foundation's functions or activities;
- collect Health Information and other Sensitive Information with appropriate consent where it is reasonably necessary, unless collection is otherwise permitted or required by law; and
- use and disclose Health Information and other Sensitive Information for the purpose for which it was collected, a directly related purpose that would reasonably be expected, with consent, or as otherwise permitted or required by law.



Types of Personal Information We Collect and Hold

The kinds of information collected depend on an individual's relationship with the Foundation. The Foundation may collect the following information where it is reasonably necessary for its activities.

Children

In connection with a sponsorship application and any approved experience, the Foundation may collect:

- full name;
- age or date of birth;
- gender;
- Parent and emergency contact details;
- photographs or recordings, where separately authorised;
- dietary, accessibility and participation requirements, where relevant.

Where reasonably necessary to assess an application or arrange a safe and suitable experience, and with appropriate consent, the Foundation may also collect:

- information about a child's disability, learning or developmental needs, relevant health conditions, allergies and support or safety requirements.

Parents

In connection with a sponsorship application and approved experience, the Foundation may collect the following information about Parents:

- name and relationship to the child;
- contact and emergency contact details;
- consent, communication preferences and relevant correspondence.

Donors and Supporters

The Foundation may collect names, contact details, donation history, transaction and receipt information, event participation, correspondence and communication preferences. Payment card or account information may be collected directly by a third-party payment provider rather than held by the Foundation.

Volunteers, Service Providers and Contractors

The Foundation may collect the following information where relevant to a person's proposed or current role:

- name, contact details and, where reasonably necessary, date of birth and emergency contact details;
- role applications, qualifications, experience, references, training and competency records;
- complaints, incidents and investigation records;
- photographs or recordings at Foundation events, where appropriate.

With appropriate consent, or where otherwise permitted or required by law, the Foundation may also collect:



- limited health information relevant to participation, accessibility or safety; and
- screening information, including Working with Children Check or police check information where required.

Website Users

When you use the Foundation's website, it may collect technical information such as the pages viewed, IP address, browser and device information, referring page and cookie data. Cookies can generally be disabled through browser settings, although some website functions may then be limited.

Purpose for Collecting Personal Information

The Foundation collects, holds, uses and discloses Personal Information to carry out its charitable activities, including:

- assessing children's eligibility and suitability for sponsorship;
- identifying and approving suitable experience providers;
- selecting and managing directors, committee members and volunteers;
- organising and managing events and fundraising activities;
- processing donations, issuing receipts, maintaining accounts and meeting insurance and administrative requirements;
- communicating about the Foundation's work and publishing authorised material;
- seeking donations and managing communication preferences; and
- meeting legal, governance, funding and reporting requirements.

Children and Parents

The Foundation collects information about children and Parents to assess applications, fund and administer approved experiences delivered by independent third-party providers, communicate with Parents and manage safety and participation requirements. This may include:

- assessing the child's candidacy for sponsorship and the suitability of the proposed experience;
- sharing the minimum information necessary with an approved provider, with appropriate authority or consent;
- taking reasonable steps to protect children from harm;
- facilitating reasonable adjustments and appropriate supports;
- responding to incidents or emergencies and meeting insurance, legal and reporting requirements; and
- evaluating and reporting on the program, using de-identified or aggregated information where practicable.

Individuals may deal with the Foundation anonymously or using a pseudonym where lawful and practicable. Identification will generally be required to assess a sponsorship application, arrange an approved experience, issue a donation receipt or meet safety and legal requirements. If requested information is not provided, the Foundation may be unable to assess an application or provide the relevant opportunity or service.



Volunteers, Service Providers and Contractors

The Foundation collects information about directors, committee members, volunteers, experience providers and contractors to assess suitability, undertake screening and due diligence, manage the relationship and meet governance, child safety, insurance and legal requirements, including:

- confirming identity, qualifications, experience and relevant checks;
- taking reasonable steps to protect children from harm;
- supporting accessibility and reasonable adjustments where required;
- confirming provider business, insurance, safety and child-protection arrangements; and
- administering the person's engagement with the Foundation.

The Foundation may also collect provider business details, ABN, insurance information, licences, child-safety documentation, risk assessments and information about relevant personnel and screening checks.

If required personal information is withheld, the Foundation may be unable to fully assess an individual's suitability for engagement, or continue with such assessment.

How Does the Foundation Collect Personal Information?

The Foundation generally collects Personal Information directly from the individual or, for a child, from a Parent. It may also collect information from a school, allied health professional, referee, screening body or other authorised person where this is reasonably necessary and appropriate consent or another lawful basis exists.

Collection methods may include:

- online or paper forms, applications, correspondence, meetings and telephone calls;
- the Foundation's website and its service providers, including cookies where used;
- approved online tools and software;
- authorised photographs, video or other recordings;
- surveys, feedback and evaluation activities;
- schools, allied health professionals and experience providers, with appropriate authority or consent;
- consent forms, incident reports, insurance records and screening information, including Working with Children Check information; and
- referees, screening bodies and publicly available sources, where appropriate.

How do we Use and Disclose the Personal Information we Collect?

The Foundation will generally use and disclose Personal Information only for:

- the primary purpose for which the information was collected;
- a related secondary purpose that the individual would reasonably expect;
- a directly related and reasonably expected secondary purpose where the information is Health Information or other Sensitive Information;
- a purpose authorised by the individual; or a purpose otherwise permitted or required by law.



The Foundation will provide an appropriate collection notice at or before the time information is collected, or as soon as practicable afterwards, explaining the purpose of collection and the usual disclosures.

Where reasonably necessary for the purposes described above, the Foundation may disclose information to:

- approved third-party experience providers, limited to the information reasonably necessary to arrange and safely deliver the experience;
- IT, cloud storage, payment, document management, administration and professional service providers;
- schools, allied health professionals and other parties authorised by the Parent or individual;
- emergency services, medical practitioners, insurers, government bodies or regulators where reasonably necessary or required by law;
- recipients of Foundation communications or publications where the relevant information or image has been authorised for publication;
- other parties authorised by the individual or Parent; and
- other persons where disclosure is permitted or required by law, including to respond to a serious threat to health or safety, suspected unlawful activity or a court or regulatory process.

Children's Images and Videos

The Foundation will obtain separate, informed consent before using an identifiable photograph or recording of a child. The consent process will distinguish between internal use, Foundation publications, the website, social media and external media. Refusing image consent will not affect a child's eligibility for sponsorship or participation in an approved experience.

Consent may be withdrawn by contacting the Foundation and will apply to future uses. Material already published or distributed may not always be capable of complete retrieval, particularly from online platforms.

The Foundation will take reasonable steps to notify attendees before photography, livestreaming or recording and to respect recorded consent preferences. A child's full name or other identifying details will not be published with an image unless specifically authorised and reasonably necessary.

Third-party Service Providers

The Foundation may engage third parties such as IT, cloud storage, payment, professional and administrative service providers. It will take reasonable steps to select suitable providers and require them to protect information, restrict its use to the agreed services, report relevant data breaches and return, delete or de-identify information when it is no longer required.

Some online or cloud service providers may store information, or permit support personnel to access it, outside Victoria or Australia. Before transferring Health Information outside Victoria, the Foundation will take reasonable steps to ensure it will receive substantially similar privacy protection or that another permitted basis for the transfer applies. The Foundation will keep its public information about likely overseas locations current where practicable.



Direct Marketing

Fundraising and community communications help the Foundation provide sponsorship opportunities for children with diverse learning needs.

The Foundation may send fundraising or community communications where the recipient has consented, would reasonably expect them, or the communication is otherwise permitted by law. A family's participation in the sponsorship program will not, by itself, place the family on a fundraising list. The Foundation will not use a child's Health Information or other Sensitive Information for fundraising or direct marketing, unless expressly authorised. Authorised volunteers, including members of the Fundraising Committee, may access contact information where necessary for their Foundation role. External fundraising providers will only receive information where permitted and subject to appropriate safeguards.

Each electronic marketing communication will provide a simple way to unsubscribe. Individuals may also contact the Privacy Officer to change their communication preferences. The Foundation will action opt-out requests within a reasonable period but may continue to send necessary administrative communications about an existing relationship.

Security and Retention of Personal Information

The Foundation takes reasonable steps to protect information from misuse, interference, loss and unauthorised access, modification or disclosure. Measures may include access controls, secure storage, strong passwords, multi-factor authentication, secure disposal and appropriate oversight of third-party providers.

Directors, committee members, volunteers and service providers must respect confidentiality and only access or use information where necessary for their authorised role.

The Foundation retains information only for as long as it is reasonably needed for the purpose for which it was collected, or as required by law, insurance, financial accountability, child safety or another legitimate recordkeeping requirement. When Health Information is no longer required, the Foundation will take reasonable steps to destroy it securely or permanently de-identify it.

The Foundation will assess and respond to suspected data breaches promptly, take reasonable steps to contain and remedy them, and notify affected individuals or regulators where required by law.

Accessing the Personal Information we hold

Individuals may request access to, or correction of, their Health Information. The Foundation will also provide access to and correct other Personal Information where reasonable and consistent with good privacy practice. Requests should be directed to the Privacy Officer.

The Foundation will respond within a reasonable period. There is no charge for making a request or seeking correction. Where permitted by law, the Foundation may charge no more than the applicable reasonable or prescribed cost of providing access and will advise the individual before incurring that cost.

The Foundation may verify the requester's identity and authority. Access may be refused or limited where permitted by law, including where disclosure would unreasonably affect another person's



privacy or create a serious threat to health or safety. Where access or correction is refused, the Foundation will generally provide written reasons and information about available complaint options. If a correction is refused, an individual may ask the Foundation to associate a statement of disagreement with the information.

Consent and Rights of Access to the Personal Information of Children

For primary school-aged children, the Foundation will generally seek consent from a Parent with authority to act for the child. A Parent may request access to information about themselves or their child. Before providing access, the Foundation may verify the Parent's identity and authority and consider the child's capacity, privacy, safety and best interests, the privacy of others and any applicable legal restriction.

Where a child has sufficient understanding and maturity, the Foundation will consider the child's own consent, access or correction request in accordance with applicable law. The Foundation may seek appropriate advice where capacity or authority is uncertain.

Quality of the Personal Information we Hold

We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy, completeness and currency of the information we hold largely depend on the accuracy of the information supplied to us or which we collect.

If information held about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request correction by contacting the Privacy Officer. The Foundation may verify your identity before processing the request.

Lodging a Complaint

A person who has a concern or complaint about the Foundation's handling of Personal Information or Health Information should contact the Privacy Officer. A written complaint will usually assist the Foundation to investigate the matter, but reasonable assistance will be provided where needed.

The Foundation will acknowledge the complaint promptly, investigate it fairly and aim to respond within 30 days. If more time is reasonably required, the Foundation will explain the delay and provide progress updates.

The Foundation may verify the complainant's identity and seek further information reasonably necessary to investigate. Complaints will be handled confidentially, subject to the need to investigate and respond.

How to contact us

If you have a query about this privacy policy or wish to make a complaint, please contact:

- Name: Privacy Officer - Shaun Mitchell
- Phone: 0418 531 421
- Email: privacy@ebflowgrow.org.au



If you are not satisfied with our response to your complaint, or you consider that the Foundation may have breached the APPs or the Privacy Act, you can make a complaint to the Office of the Australian Information Commissioner (OAIC).

Office of the Australian Information Commissioner:

- Postal Address: GPO Box 5288, Sydney, NSW, 2001
- Phone: 1300 363 992
- Email: foi@oaic.gov.au
- Website: www.oaic.gov.au

If you are not satisfied with the Foundation's response to a complaint about Health Information, you may contact the Victorian Health Complaints Commissioner. If the Privacy Act applies to the matter, you may also be able to complain to the Office of the Australian Information Commissioner.

Victorian Health Complaints Commissioner:

- Phone: 1300 582 113
- Website: www.hcc.vic.gov.au

Policy Review and Approval

This policy will be reviewed at least every three years and earlier following relevant legal or operational changes, a material change to information-handling practices, or a significant privacy, data-breach or child-safety incident.

Date approved: 10/10/2026

Approved by: Board

Date for review: 30/05/2028

