



OUR PRIVACY POLICY

Personal information use and disclosure

Nutrition Health and Wellbeing will NOT use any of your personal information for any other purpose, or disclose your personal information to any other organisations or individuals (including any overseas recipients), unless authorised by law, this Privacy Policy or you provide your consent for us to do so.

The Nutrition Health and Wellbeing privacy policy describes:

- how we use your personal information
- why some personal information may be given to other organisations from time to time
- how you can access the personal information we have about you on our system
- how you can complain about a privacy breach, and how the Nutrition Health and Wellbeing deals with the complaint
- how you can get your personal information corrected if it is wrong.

You can find the policy at <https://nutritionhealthandwellbeing.com.au/>

INTRODUCTION

Here at Nutrition Health and Wellbeing (ABN 51 768 459 096) protecting your privacy and treating your personal information with care is of paramount importance to us. This Privacy Policy explains what personal information we collect, why we collect personal information and how we collect, use, disclose, store and protect your personal information when you visit our website, provide us with information yourself (such as when you sign up to our service or use our services) or when you accept services from us.

It also explains how to contact us to correct, update or delete any personal information provided to us, or make a complaint if you have concerns. We are compliant with the Privacy Principles of Australia.

We will only collect and process personal information about you where we have a lawful basis to do so. Lawful basis includes consent (where you have given consent), use of our service (where processing is necessary for the performance of our service with you) and legitimate interests (including security threats or frauds, risk of harm to self or others, compliance with applicable laws, and enabling us to administer our service).

You expressly and voluntarily grant your informed consent to Nutrition Health and Wellbeing to deal with your personal information in accordance with the terms and conditions of this Privacy Policy. You have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object.

CHANGES THAT WE MAKE TO OUR PRIVACY POLICY

We update our Privacy Policy from time-to-time and you are encouraged to periodically review this Privacy Policy to stay informed of updates.

COLLECTION OF YOUR PERSONAL INFORMATION BY THIRD PARTIES

This Privacy Policy does not apply to any third-party linked which may also collect and use information about you. We are not responsible for any of the information collected by any such third party.

IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS NUTRITION HEALTH AND WELLBEING WEBSITE, USE OUR SERVICE OR PROVIDE ANY INFORMATION ABOUT YOURSELF TO US.

WHICH ENTITIES DOES THIS PRIVACY POLICY COVER?

This Privacy Policy applies to Nutrition Health and Wellbeing with respect to content on our website, our service and information you provide to us about yourself.

WHAT IS PERSONAL INFORMATION?

Personal information is defined as information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

WHEN AND HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect most personal information directly from you when you consent to use our service or receive communications from us. Your consent may be express (e.g. you agree to the use of your information by ticking a box) or implied by an action you take or do not take (i.e. because you have agreed to terms and conditions that contain information about the use or disclosure of your information).

You provide us your information when you use our service or you use our website generally or you deal with us.

WHAT PERSONAL INFORMATION DO WE COLLECT?

Information you share with us

We collect information as it relates to personal communications that you have with us. This may be through website, signup sheets at our office, email or messaging or telephone or other types of communication platforms.

Personal Data

We collect demographic and other personally identifiable information (such as your name and email address).

Sensitive Information

As part of delivering our services, we may collect or infer health and other sensitive information about you as defined by the *Privacy Act 1988* (Cth) ("Privacy Act"). Certain health information may be inferred from other information that you give us. Before you can give us health information, you must give your explicit consent to the processing of that health information by us. You can withdraw your consent to us processing your health information at any time. For example, in using our services we may collect medical history information about you, or you may provide us with your current health status to assist us in providing you services. In general, we attempt to limit the sensitive information we collect, however this may not always be possible due to the services we provide. Where we collect sensitive information from you we will only do so if it is considered reasonably necessary for us to collect such information for us to perform our functions or activities and you consent, or collection is required or authorised by law or another exception under the Privacy Act applies. However, we may also collect Sensitive Information without your consent where we provide you with a health service or where it is otherwise permitted by the Privacy Act in order to carry out our services. This includes where collection is required to lessen or prevent a serious threat to your life, health or safety or to public health and safety. For more information on health services please contact us.

WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

We may collect your personal information when required by law but generally we collect personal information from you (or about you) to allow us to:

- supply you with information about our service and general health and diet advice about yourself;
- supply you with tailored service offerings that may benefit you;
- communicate more effectively with you about our services and your care; and
- ensure your experience with us is a positive one.

Personal information collected or received by us will only be used for the stated purpose for which it was provided.

WHEN DO WE DISCLOSE YOUR PERSONAL INFORMATION?

Your personal information will not be used contrary to this Privacy Policy but may be disclosed to third parties in the following circumstances:

- if you provide your express consent to the disclosure;
- for the purpose it was collected;
- if we need to restructure our service or another organisation takes up our service;
- to enforce our legal rights or those of others;
- to prevent actual or potential fraud, self-harm or harm to others or illegal activity; or
- if we are required to do so by law.

If personal information is disclosed to a third party, we are required to take all reasonable steps to ensure your personal information is treated in accordance with the laws that apply to personal information in that country.

WHAT IF YOU DON'T WANT US TO COLLECT YOUR PERSONAL INFORMATION?

You are not obligated to provide us with your personal information. You may choose whether you receive communications from us. Whilst it is your choice not to provide your personal information to us this may impede our ability to provide you with all the functionality of our service.

WHAT IF YOU DON'T WANT TO RECEIVE FURTHER COMMUNICATIONS FROM US?

Should you wish to remove yourself from our database you may do so at any time by contacting us.

HOW CAN I ACCESS, CORRECT AND/ OR UPDATE PERSONAL INFORMATION YOU HAVE COLLECTED?

At any time, you may contact us and request your personal information be modified. We will make all efforts to correct data once we have proved your identity.

We will deal with all requests for access to personal information as quickly as possible, but no later than 30 calendar days from the date of your request (unless any complexities arise). Requests for a large amount of information, or information which is not currently in use, may require further time before a response can be given.

We will provide you your personal information in a structured, commonly used, machine-readable format.

In some cases, we will refuse to give you access to personal information we hold about you. If this occurs we will tell you why and you will have an opportunity to respond.

We will also refuse access where the personal information relates to existing or anticipated legal proceedings, and the information would not be accessible by the process of discovery in those proceedings. Further, we will refuse access where your request is frivolous or vexatious, and where we reasonably believe that:

- giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- unlawful activity, or misconduct of a serious nature, is being or may be engaged in against Nutrition Health and Wellbeing and giving access would be likely to prejudice the taking of appropriate action in relation to that matter.

If we refuse to give you access we will provide you with reasons for our refusal, unless doing so would be unreasonable in the circumstances. We will also take reasonable steps to give you access in a way that meets your needs without giving rise to the reasons of our refusal. Further, we will provide details of how you may make a complaint about our decision.

Please note that the access and correction requirements under this Privacy Policy operates alongside and do not replace other informal or legal procedures by which an individual can be provided access to, or correction of, their personal information.

HOW DO WE STORE AND PROTECT YOUR PERSONAL INFORMATION?

For us to provide excellent service we are required to store some personal information and take the greatest of care to ensure this information is treated as private and confidential. Transmitting personal data via the internet does have inherent risks associated with it. We will however take all reasonable steps to ensure the security of this data.

We have taken the necessary measures to ensure the personal information we hold is not compromised. In accordance with and as permitted by applicable law and regulations we will retain your information as long necessary to serve you, to maintain your Nutrition Health and Wellbeing account or as otherwise need to operate our service.

Our secure centre is equipped with the latest technology, infrastructure and dedicated technical staff to ensure our working environment has complete reliability and security for your data. However, we cannot be held liable for events outside our control particularly with respect to third parties who act as repositories of your information.

Our website is protected by security certificates and are built considering all modern security stands where possible. We will take reasonable steps to maintain the integrity and security of any personal information we have stored, including taking reasonable steps to prevent interference and loss, misuse, unauthorised access, modification or disclosure of such personal information.

Note that no information transmitted over the Internet can be guaranteed to be completely secure. While we will endeavour to protect your personal information as best as possible we cannot guarantee the security of any information that you transmit to us, or receive from us. The transmission and exchange of information is carried out at your own risk.

It is important that you protect your privacy by ensuring that no one obtains your personal information and you must contact us either directly if your details change. Should your information be erroneously provided to us or no longer remain valid within the constraints of this Privacy Policy we will securely destroy or de-identify it as soon as practicable, as long as it is lawful to do so.

We have obligations to notify you if you are affected by a data breach. We will take all reasonable precautions to take remedial action to prevent such an event. However, as we cannot guarantee that remedial action will be sufficient to prevent all instances of a breach, we will take steps to notify you of an eligible data breach as soon as practicable, and provide recommendations as to what steps you should take to mitigate any serious issues.

LOG DATA

Whenever you use our website, in a case of an error in the website we collect data and information (through third party products) on your phone called Log Data. This Log Data may include information such as your device, Internet Protocol address, device name, operating system version, the configuration of the device when utilizing our website, the time and date of your use of Nutrition Health and Wellbeing and other statistics.

TRANSFER OUT

We may transfer your personal information to our hosting service providers and data centres. You hereby expressly and voluntarily grant your informed consent to such transfers.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify or amend this Privacy Policy at any time.

If you object to any changes, you may cease using our website and/or our services. You acknowledge and agree that your continued use of our website means that the collection, use and sharing of your personal information is subject to the updated Privacy Policy.

COOKIES

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our website, we may collect information from you automatically through cookies or similar technology.

Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

HOW DO WE USE COOKIES?

We use cookies in a range of ways to improve your experience on our website, including understanding how you use our website.

WHAT TYPES OF COOKIES DO WE USE?

There are many different types of cookies, however, our website uses cookies so that we recognize you on our website and remember your previously selected preferences. These could include the location you are in. A mix of first-party and third-party cookies are used.

HOW TO MANAGE COOKIES

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

THIRD PARTY SITES

Our site may have links to other websites and services provided on those websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that we are not responsible for the privacy practises of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

ENQUIRIES, REQUESTS & COMPLAINTS

Enquiries regarding this Privacy Policy or the personal information we may hold on you, should be addressed with the Privacy Officer, whose contact details are below.

If you think your personal information, held by us, may have been compromised in any way or you have any other Privacy related complaints or issues, you should also raise the matter with the Privacy Officer.

We will ensure your claims are investigated and a formal response will be provided to you, within a reasonable time, considering the circumstances of your claims. If any corrective action is determined to be required, as a result of that investigation, we will take all reasonable steps to rectify the situation and advise you of such, again within a reasonable time considering the circumstances.

If we do not resolve your enquiry, concern or complaint to your satisfaction or you require further information in relation to any privacy matters, please contact the Office of the Australian Information Commission (OAIC), whose contact details are below.

Office of the Australian information Commission

Telephone	1300 363 992
Email	enquiries@oaic.gov.au
Office Address	Level 3, 175 Pitt Street, Sydney NSW 2000
Postal Address	GPO Box 5218, Sydney NSW 2001
Website	www.oaic.gov.au

Contacting us

Privacy Officer	Leeanne Azzopardi
Entity	Leeanne Azzopardi trading as Nutrition Health and Wellbeing Group (ABN 51 768 459 096)
Telephone	1800 313 800
Email	admin@nhwellbeing.com.au
Postal Address	PO BOX 444 Essendon North VIC 3041