

# New Reflections – Privacy policy

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## INTRODUCTION

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At New Reflections, we take online privacy at heart. We want to provide our visitors with the best possible online experience.

This document details New Reflections' privacy policy. We described the personal information that we collect, why we hold it, and how you can have access to or delete it.

New Reflections is bound by the Privacy Act 1988 and the thirteen Australian Privacy Principles (APPs). We do not currently deal directly with EU citizens, but we made the choice to seeking compliance with the GDPR (General Data Protection Regulation) as well.

## SCOPE & COLLECTION OF PERSONAL INFORMATION

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*You may use and view our site without providing personal information. However, our website collects the following data:*

### GENERAL DATA

#### **What our website does:**

Every time someone visits our website, we collect information. However, in compliance with GDPR, this information can't be linked to an individual: the information that we collected is not personified.

Information collected may include: browser, language, pages viewed while browsing the site and how long it took to load them and operating system.

**Why we do it:**

This information is used by New Reflections and New Reflections employees only to personalise the content that we offer to each visitor while they're on the website, and track visitor traffic.

## COOKIES

We may use cookie technology on our websites to provide information and services to website visitors. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Cookies in and of themselves do not personally identify you, although they do identify your browser. Most web browsers are set to accept cookies. Cookies are useful to determine overall traffic patterns through our websites. If you do not wish to receive any cookies you may set your browser to refuse cookies.

We only use cookies that are necessary to our activity. This information is only used for the purpose for which you provided it. The cookies we use are provided by Google Analytics and Wix.

## LOG FILE

In order to manage our website and gather general visitor's information, our website makes log files. They collect number of clicks, date of visit, accessing and exiting pages, browser, IP and ISP.

However, this information can not in any way be linked to an individual.

## VISITOR AND CUSTOMER DATA

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### SHARING OF YOUR PERSONAL INFORMATION

New Reflections uses Google Analytics for the treatment of data. Google Analytics may collect information regarding the visitor's location, age and gender, browser type and device type.

### DURATION OF CUSTOMER DATA

Until told otherwise, New Reflections will hold the visitor's data indefinitely.

## YOUR INFORMATION

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### WHAT PERSONAL INFORMATION DO WE COLLECT?

New Reflections collects personal information from customers, employees, contractors, partners and other individuals. We collect this information when it is necessary for business purposes.

Whenever it's reasonable and practicable to do so, we only collect information about you that comes directly from you.

So that we can provide and improve our services, we may collect personal information such as:

Your name

Address

Telephone number

Email address,

Other identifiers or identification and / or information about your use of our products and services.

We do not collect sensitive information about you without your consent. Sensitive information may include information regarding: racial or ethnic origins, political or religious beliefs, sexual preferences, membership of professional or trade associations or unions, health information, or criminal convictions.

The personal information we collect may be provided on forms filled out by individuals (including when you register to our Newsletter and when you agree to purchase services from us), in face-to-face meetings, email messages, telephone conversations, or from third parties. If you contact us, we may keep a record of that contact. We will collect personal information about you only from you where it is reasonable and practical to do so, or required by law.

Employee records are generally not subject to the Privacy Act and, therefore, this Privacy Policy does not apply to the handling of information about employees by New Reflections. For information about our practices relating to employee information, please contact us directly.

### WHY WE COLLECT YOUR PERSONAL INFORMATION

We only collect personal information about you, which is reasonably necessary:

- to enrol you as a student at New Reflections;
- to assess your enrolment application in relation to our New Reflections education and training services and New Reflections courses;
- to employ you as a staff member or consultant at New Reflections;

- to allow you to be a client, stakeholder, contractor or supplier of New Reflections;
- when you register with New Reflections to receive information about our New Reflections education and training services and courses via the telephone, email or Website;
- when you complete a survey form;
- when you communicate, receive information or make enquiries about our New Reflections education and training services and courses;
- for the purposes of direct marketing or to send marketing materials about our new education and training services and courses;
- for feedback on our New Reflections education and training services and courses;
- to maintain your contact details and other relevant information that enables us to service you more effectively in relation to our New Reflections education and training services and courses.

## USE OF YOUR PERSONAL INFORMATION

The personal information we collect is confidential. Our purpose in collecting information about you is to provide you with a better website experience, to provide products or services to you and to operate our business.

Some examples of when we may need to collect, use and disclose this information are in relation to prospect enquiries, for email newsletter registration, for providing customers with products and services, and for customer complaint handling.

New Reflections may use your personal information to advise you of new products and services or special offers or promotions. New Reflections' employees or contractors from time to time may also use your personal information to provide information to you about products and services that they may offer from time to time. If at any time you do not wish to receive such information from us, or our employees, you can opt out of receiving such information when registering on our website, or you may remove your name from our list by calling us on (02) 9569 6906 and asking to be removed from our mailing list. Alternatively, if we have sent you this information by email, you can use the unsubscribe link at the end of the email. In either case, please allow 5 business days for this request to be processed.

In the course of our business, we use a range of service providers to help us maximise the quality and efficiency of our services and business operations. This means that individuals and organisations outside of New Reflections may sometimes have access to personal information held by New Reflections and may use this on behalf of New Reflections. We require our service providers to adhere to strict privacy guidelines and not to keep this information or use it for any unauthorised purpose.

New Reflections do not disclose personal information to any third parties. New Reflections will not use or disclose any personal information about you without your consent unless:

Required or authorised by law;

It is permitted by this Privacy Policy;

We believe this is necessary to provide you with the services you have requested;

It is necessary to implement our terms of service;

It is necessary to protect the rights, property or personal safety of an New Reflections employee, another customer, or any member of the public or New Reflections; or

Some or all of the assets and operations of the business are or may be transferred to another party by way of sale of some or all of New Reflections' business.

## CONSENT, ACCESS TO YOUR PERSONAL INFORMATION

New Reflection provides complete and immediate access to their data, upon request. This information can and will be completed (if inaccurate or incomplete) or deleted if you wish.

## HOW DO WE STORE PERSONAL INFORMATION?

New Reflections will endeavour to take all reasonable steps to keep secure any information we hold about you and keep this information accurate and up-to-date. Your personal information is store electronically.

New Reflections has security processes in place to protect personal information from misuse, loss or unauthorised access, modification or disclosure. The types of measures we take vary with the type of information and how it is collected and stored. We require our employees, agents, contractors and data processors to respect the confidentiality of any personal information held by us.

## HOW TO MAKE A REQUEST REGARDING YOUR INFORMATION

Upon your request, we will provide you with access to any of your personal information we hold. If you require access to your personal information, please contact us. Of course, before we provide you with access to your personal information, we will require some proof of identity. We will usually be able to respond to your request within 31 days.

e-mail address: [contact@newreflection.com.au](mailto:contact@newreflection.com.au)

New Reflections will take reasonable steps to correct any information, which is found not to be accurate, complete or up-to-date. If you wish to change personal information that is inaccurate, incomplete or out-of-date, please contact us and we will amend this record. If you wish to have your personal information deleted, please contact us and we will take all reasonable steps to delete it unless we need to keep it for legal reasons.

## BLOGS, FORUMS AND OTHER SOCIAL MEDIA

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The Website may host a blog and linked to different social media such as Google +, Facebook, Linkedin and Instagram that allow you to share content with other users. Any

personal information or other information that you contribute can be read, collected and used by other users over whom we have little or no control. We are not responsible for any other user's use, misuse or misappropriation of any personal information or other information that you contribute.

You agree that we may use all of the information, including customer testimonials and feedback that you post in social media applications including Facebook, Instagram and Google + for the purposes set out in this privacy policy.

## CHANGES TO THIS PRIVACY POLICY

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As our business continues to evolve, our policies will be reviewed from time-to-time and may be revised. New Reflections reserves the right to amend its privacy policy at any time and notify you by posting an updated version of the policy on its websites. The amended Privacy Policy will apply between us whether or not we have given you specific notice of any change. The data we collect at the time of the policy change will adhere to our updated privacy policy.

## CONTACT US

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We welcome any questions, recommendations or remarks that you may have regarding our privacy policy. For further information or any concern or complaint, please write or call:  
contact@newreflection.com.au  
+61 (0)2 9569 6906

More information about privacy law is available from the Office of the Australian Information Commissioner at <http://www.oaic.gov.au/>