



## Belfinn Coaching Privacy Policy

**Belfinn Coaching is a trading name of Finnbell Consulting Pty Ltd.** We are committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aaic.gov.au](http://www.aaic.gov.au)

### **What is Personal Information and why do we collect it?**

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect may include *names, addresses, email addresses and mobile phone numbers.*

This Personal Information is obtained in many ways including ***interviews, program application forms, program evaluations, correspondence (i.e. by telephone or email) via our websites [www.finnbell.com.au](http://www.finnbell.com.au) or [www.belfinn.com.au](http://www.belfinn.com.au), Social Media (including Facebook, Instagram and Linked In), cookies and from third parties.***

We collect your Personal Information for the primary purpose of providing our services to you and to support with marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure (for example in relation to you being able to access courses via the e-learning platform).

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

## **Sensitive Information**

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

## **Third Parties**

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

## **Disclosure of Personal Information**

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

## **Security of Personal Information**

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

## **Online activity**

The [www.finnbell.com.au](http://www.finnbell.com.au) and [www.belifinn.com](http://www.belifinn.com) websites use cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise

when your device has visited our website(s) before, so we can distinguish you from other users of the website with the aim to improve your experience.

We do not use cookies to identify you, just to improve your experience on our websites. If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

Our websites also use Google Analytics to help us better understand visitor traffic, so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.

## **Links to third party sites**

Our websites [www.finnbell.com.au](http://www.finnbell.com.au) and [www.belfinn.com](http://www.belfinn.com) may contain links to websites operated by third parties. If you access a third party website through our website(s), personal information may be collected by that third party website. We make no representations or warranties in relation to the privacy practices of any third party provider or website and we are not responsible for the privacy policies or the content of any third party provider or website.

Third party providers / websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies

## **Direct marketing**

We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications.

These communications may be sent in various forms, including mail, messaging services, SMS, and email, in accordance with applicable marketing laws, such as the Australian Spam Act 2003 (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us at any time by following the instructions to "unsubscribe" set out in the relevant communication and/or by contacting us using the details set out in the "How to contact us" section below.

## **Access to your Personal Information**

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing via email in the contact details outlined below.

**Finnbell Consulting Pty Ltd** will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

## **Maintaining the Quality of your Personal Information**

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

## **Policy Updates**

This Policy may change from time to time and is available on our website.

## **Privacy Policy Complaints and Enquiries**

If you have any queries or complaints about our Privacy Policy please contact us at:

[katheryn@belfinn.com](mailto:katheryn@belfinn.com)

**+61 410 327 674**

**6/211 Victoria Square, Adelaide SA 5000**