

At Elevate Leadership, we are committed to protecting your privacy and maintaining the highest standards of confidentiality. In line with the **Australian Privacy Act 1988**, the **Australian Privacy Principles (APPs)**, and the ethical standards set by the **International Coaching Federation (ICF)**, we prioritise the safety and security of your personal information.

This Privacy & Confidentiality Policy outlines how we collect, uses, disclose, and safeguard your personal data. It aims to provide transparency regarding our practices and demonstrate our commitment to complying with legal requirements and ethical standards, ensuring that your privacy is protected and confidentiality maintained.

Information Collection and Purpose

Elevate Leadership collects personal information, including but not limited to names, addresses, email, phone numbers, and payment details. This information may be collected through various means, such as interviews, correspondence, telephone calls, emails, our website, and third-party sources.

The primary purpose for collecting this information is to provide our leadership coaching, development, and HR services. With your consent, this information may be used for secondary purposes, including:

- Sending promotional materials or newsletters about our services.
- Conducting surveys or client feedback to improve services.
- Sending invitations to events or webinars related to leadership development.

Sensitive Information. In certain situations, with your explicit consent, we may collect sensitive information such as health details or financial information, racial or ethnic origin, religious beliefs or political opinions. This information can be used to tailor our services to your specific needs, such as adjusting coaching methods to accommodate health conditions, adapting learning content and delivery methods to suit backgrounds or beliefs. Sensitive information will only be disclosed for secondary purposes if explicitly authorised by you or required by law.

We will only collect personal and sensitive information with your consent, and you have the option to refuse, opt-out or withdraw your consent at any time. To do so, please contact us using the details provided below.

In addition to client data, we also collect and process personal information of staff and contractors. This information is handled in accordance with this policy, employment agreements or contracts, and applicable laws.

Use and Disclosure

Elevate Leadership uses personal information to:

- Provide leadership coaching, development, and HR services.
- Communicate with you regarding services, respond to inquiries, and provide relevant updates.

Improve our services, develop new offerings, and enhance client satisfaction.

Personal information will only be disclosed to third parties with your explicit consent or as required by law. If we engage third-party providers to assist with services (e.g., payment processors, data storage), we ensure they comply with privacy obligations to protect your information.

Storage and Security

We take all reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure.

This includes:

- Storing personal information securely and limiting access to authorised personnel only.
- Retaining information only as long as necessary to fulfill its purpose and in accordance with legal requirements.
- Ensuring all data is securely stored within Australia and not sent or stored outside the country.

If you are located outside of Australia, please be aware that your personal data may be transferred to Australia. By providing us with your personal information you consent to its transfer and storage within Australia.

We regularly assess our security practices and systems to ensure they remain robust and compliant with industry and legal standards. These assessments help us identify and mitigate any emerging risks to your data.

Record Retention. Client records will be retained for up to **seven (7) years** for continuity of service, legal compliance, and potential audits. After this period, records will be de-identified and securely disposed of or destroyed. Refer to our **Record Retention Statement** for additional information – www.elevateleadership.com.au/policies.

Access and Correction

You have the right to access personal information we hold about you and request corrections if the information is inaccurate, incomplete or outdated.

If you wish to access or correct your personal information, please contact us using the details provided below. We will respond to your request in a timely manner and in accordance with applicable privacy laws.

Third-Party Information

Elevate Leadership collects personal information directly from clients whenever possible. In instances where personal information is provided by third parties, we take reasonable steps to ensure that clients are informed and aware of the source of their data.

We also ensure that any their-party providers comply with applicable privacy laws and obligations in handling your personal information.

Confidentiality

At Elevate Leadership, we are committed to maintaining strict confidentiality regarding all information shared during or in connection with our service provision.

This includes:

- Adhering to confidentiality principles outlined in the ICF Code of Ethics.
- Keeping all information shared (verbally or documented) strictly confidential, and disclosing it only with explicit consent, as required by law, or within the **limits of confidentially**.
- Storing records and information securely, and using them solely to provide services, communicate with clients, or to enhance client satisfaction.

We ensure that confidentiality is maintained when services are delivered through online or virtual platforms, including video conferences and digital communications. These meetings or sessions are encrypted, and only authorised personnel have access to stored recordings or notes.

Clients are encouraged to raise any confidentiality-related questions or concerns with Elevate Leadership using the contact details provided below.

Limits of Confidentiality. There are certain situations where confidentiality may not apply, including if there is a risk of harm to the client or others, if disclosure is required by law, or where the information is already publicly available.

It is important to note that the Coach-Client relationship is not legally confidential in the same manner as relationships in the medical or legal professions (legal privilege does not apply). However, the absence of legal privilege does not diminish or restrict the coach's duty of confidentiality as outlined in the ICF Code of Ethics. Refer to our Confidentiality Statement for additional information – www.elevateleadership.com.au/policies.

Confidentiality in Coaching

We uphold the highest standards of confidentiality in all coaching engagements, in line with the ICF principles and ethical standards.

All information shared (verbally or documented) during coaching is kept confidential and will
not be disclosed without explicit consent, except where required by law, if there is a risk of
harm, or within the limits of confidentiality.

In addition to the Clients right to privacy and confidentiality, Elevate Leadership and the Coach are also committed to protecting the integrity of the coaching relationship.

 If the Coach believes the Clients actions or requests are in violation of the coaching agreement, breach ethical standards, or compromise the privacy and confidentiality policy

- (such as pressuring the Coach to disclose confidential information without written consent), the Coach reserves the right to terminate the coaching relationship.
- The Client agrees to cooperate with the Coach to uphold confidentiality standards, recognising that failure to do so may result in a termination or alteration of coaching services.

Coaching Records. Records of coaching sessions, including notes and recordings, are stored securely and only accessible by authorised personnel. These records are used exclusively to provide high-quality coaching services and continuity of care. They will be retained only for as long as necessary and, once no longer required, will be de-identified and securely disposed of or destroyed.

If you wish to request access to your coaching records during the retention period, please contact us using the details provided below. We will provide access to your records, or if necessary, schedule a time to review them together to ensure continuity of care.

Organisational Coaching

Elevate Leadership is committed to balancing the needs of the organisation with the privacy of the employee(s) being coached. We prioritise the confidentiality and privacy of the individual employee and will not disclose specific details of coaching sessions without explicit consent, unless required by law, or within the limits of confidentiality.

- Written consent will be obtained from the employee before sharing any specific information with the organisation.
- General progress reports will be provided to the organisation. These will include overarching themes and development areas, while excluding any specific details shared by the employee during coaching sessions.
- Any feedback or evaluation provided to the organisation will respect the employee's
 confidentiality and will be aligned with agreed-upon terms and conditions of the coaching
 engagement. Employees will always have the right to review any feedback before it is shared
 with the organisation.
- In cases of a conflict of interest between the organisation and the employee, Elevate Leadership will prioritise the ethical standards set by the ICF in resolving such conflicts.

If the organisation pressures the coach to breach confidentiality, the coach reserves the right to terminate the relationship with the organisation.

Release of Information

Elevate Leadership and its staff may engage in training or continuing education to maintain or pursue ICF or other professional credentials or accreditations. During this process, we may need to disclose certain client information to certified bodies.

- This information will only be disclosed with the client's explicit written consent.
- Disclosure of information will be limited to the company name, client name, contact information and the start/end dates of services.
- No personal notes or sensitive information will be shared.

In line with Elevate Leadership's professional and ethical standards:

- Anonymous or hypothetical topics may be shared with other professionals for training, supervision, mentoring, evaluation and development purposes.
- Any data collected for reporting or research purposes will be anonymised to protect the client's identity.

Website and Social Media

The Elevate Leadership website collects and monitors data, including the IP address of devices used to access it. An IP address is a unique number assigned to a device when it connects to the internet. This information is used to analyse website trends, such as the number of unique visitors to the site and geographic origin.

We use personal information submitted through forms (such as contact forms or newsletter subscriptions) solely for the purpose for which it was collected, such as responding to inquiries or sending newsletters. We will not share this data with third parties without your consent, except as required by law.

We may use third-party analytics providers (such as Google Analytics) to analyze website traffic. These providers may collect data on how you interact with our website to help us improve our services. Please refer to the privacy policies of these third-party providers for more information.

We implement reasonable security measures to protect your data from unauthorised access, alteration, or disclosure. However, please note that no method of internet transmission or electronic storage is 100% secure.

Cookies. The Elevate Leadership website may use cookies to enhance user experience. Cookies are small text files that are stored on your device to improve functionality (such as remembering your preferences). You can manage or delete cookies through your browser settings, though disabling cookies may impact certain website features.

Cookies do NOT personally identify users.

Third-Party Websites. The website may contain links to third-party websites. Elevate Leadership is not responsible for the privacy practices or information security of external sites. These websites are not governed by our Privacy Policy.

Any information disclosed by clients via third-party websites, social media platforms, or review sites (such as Google Reviews) is publicly accessible and can be viewed, copied, or collected by other users. Please review the privacy policies of any third-party websites you visit.

Social Media and Online Interactions. If you interact with us through social media platforms (such as Facebook or LinkedIn), we may collect publicly available information from your profile. We encourage you to review the privacy settings and policies of those platforms to manage your data.

Children. Our services are not intended for children under the age of 16. We do not knowingly collect personal data from children. If we learn that we have inadvertently collected personal data from a

child under 16, we will take prompt steps to delete such information and notify the child's parent or guardian as appropriate.

If you believe we have inadvertently collected personal data from a child under the age of 16, please contact us immediately. We will take the necessary steps to delete such information from our records and make the appropriate notifications.

Feedback and Complaints

We take your privacy seriously and are committed to addressing feedback and complaints in accordance with the **Australian Privacy Act 1988** and the **APPs**.

If you believe your privacy rights have been breached or violated, we encourage you to contact us immediately so that we can resolve your concerns promptly.

You may reach us via:

• **Email**: info@elevateleadership.com.au

• **Phone**: 0437 632 947

• Contact: Linda Quinton, Founder

When providing feedback or lodging a complaint, please provide as much detail as possible regarding your concern, including any relevant information to help us investigate the matter thoroughly.

Upon receiving your feedback or complaint, we will acknowledge it as soon as possible and aim to investigate and resolve the issue in a timely manner. We will keep you informed throughout the process.

If you are not satisfied with our response, you have the right to escalate your complaint to the **Office of the Australian Information Commissioner (OAIC)**:

• Website: https://www.oaic.gov.au

• **Phone**: 1300 363 992

• **Email**: enquiries@oaic.gov.au

Data Breach Management

In the event of a data breach that compromises the security or confidentiality of personal information, Elevate Leadership is committed to responding in compliance with the **Australian Privacy Act 1988** and the **Notifiable Data Breaches (NDB) Scheme**.

What Constitutes a Data Breach? A data breach occurs when personal information is accessed, disclosed, lost, or destroyed without authorisation, in a manner that could result in serious harm to an individual. This may include risks such as identity theft, financial loss, or emotional distress.

Our Response to a Data Breach. If we become aware of a data breach, we will promptly investigate to assess the nature and scope of the incident. We will determine if the breach is likely to result in serious harm and take immediate action to mitigate the impact.

Notifiable Data Breaches (NDB) Scheme. If the breach meets the criteria for notification under the **NDB Scheme** we are required to notify the affected individuals and the **OAIC**.

We will:

- 1. **Notify Affected Individuals.** If the breach is likely to cause serious harm, we will notify affected individuals as soon as possible, including:
 - A description of the breach.
 - The types of personal information involved.
 - Steps taken to address the breach and minimise harm.
 - Information on how individuals can protect themselves from further harm.
- 2. **Notify the OAIC.** We will notify the **OAIC** within 30 days of becoming aware of the breach, providing details such as:
 - A description of the breach.
 - The types of personal information involved.
 - Steps taken to mitigate the breach.

Steps You Can Take. If you believe your personal information has been compromised, we recommend:

- Monitor your accounts for unusual activity.
- Change passwords or PINs.
- Contact us immediately for assistance.

Preventing Future Data Breaches. We are committed to protecting your personal information through robust data security measures. We continually assess and improve our security practices to minimise the risk of future data breaches.

Policy Updates

This policy may be updated periodically to reflect changes in our practices or legal requirements. Any changes will be communicated to clients as appropriate, and the revised policy will be posted on our website. We encourage clients to regularly review the latest version of our policies on our website at https://www.elevateleadership.com.au/polies.

Contact information

We highly value your feedback and are committed to addressing any concerns, questions, or suggestions you may to improve your experience with us.

Please contact us via:

• Email: info@elevateleadership.com.au

• **Phone**: 0437 632 947

• Contact: Linda Quinton, Founder

Additional Information

The **Privacy Act 1988** governs the collection, storage, and handling of personal data in Australia. The **Australian Privacy Principles (APPs)** set out the standards, rights and obligations for the protection of personal data, which this policy complies with. For more detailed information, please refer to the official websites of the **Office of the Australian Information Commissioner (OAIC)**.

- Office of the Australian Information Commissioner (OAIC) https://www.oaic.gov.au/
- The Privacy Act https://www.oaic.gov.au/privacy/the-privacy-act/
- Australian Privacy Principles https://www.oaic.gov.au/privacy/australian-privacy-principles/

The ICF Code of Ethics sets ethical standards for coaches, ensuring professionalism, confidentiality, and integrity in client relationships. It emphasis's the coach's responsibility to maintain clear agreements, act transparently, and protect client welfare. The ICF Core Coaching Competencies outline the essential skills coaches must demonstrate, including building trust, active listening, effective communication, and facilitating client growth. These standards ensure coaches provide high-quality, ethical services that support clients in achieving meaningful results. For more details, refer to the ICF website.

- ICF Code of Ethics https://coachingfederation.org/ethics/code-of-ethics
- ICF Core Coaching Competencies https://coachingfederation.org/credentials-and-standards/core-competencies

Elevate Leadership is committed to protecting the privacy and confidentiality of its clients while maintaining the highest ethical standards. Our policies and practice statements are designed to ensure transparency in how we do this. For more detailed information on our practices, please refer to the full suite of policies and practices on our website.

• Elevate Leadership-Policies https://www.elevateleadership.com.au/policies

We value your feedback and are committed to addressing any concerns or suggestions you may have to improve your experience with us. Please email: info@elevateleadership.com.au