

CoachU Privacy Policy



1. Introduction

1.1 CoachU Australia Pty Ltd ACN 676363465 ("CoachU," "we," "our," "us") is committed to protecting your privacy and ensuring the security of your personal information. This Privacy Policy outlines how we collect, use, disclose, and safeguard your information when you use the CoachU Platform.

1.2 By providing your Personal Information, you agree that it will be used and disclosed by CoachU in accordance with this Policy. Your use of the CoachU Platform after the effective date of this document constitutes your acceptance of this Policy.

2. Definitions

- **Personal Information:** Information that is personal information as defined in the Privacy Act 1988 (Cth) or that is information to which any other Privacy Laws apply.
- **Privacy Laws:** All laws relating to privacy, confidentiality, or use of any information about individuals, including:
 - The Privacy Act 1988 (Cth) and the National Privacy Principles contained in schedule 3 to that Act or any approved privacy code that applies to any of the parties to this agreement;
 - The Privacy and Data Protection Act 2014 (Vic) and the Information Privacy Principles contained in schedule 1 to that Act; and
 - The Health Records Act 2001 (Vic) and the Health Privacy Principles contained in schedule 1 to that Act.
- **CoachU Platform:** The CoachU website at www.coachaustralia.com.au, including its subdomains and any other website that we operate from time to time.

3. Personal Information We Collect

3.1 Personal information that we collect may include (but is not limited to):

- Name
- Date of birth
- Phone number
- Current address
- Email address
- Gender
- Year level
- Ethnicity
- School subjects
- Career ambitions
- University ambitions
- Interests/hobbies
- Identification information, including information relevant to verify working with children checks
- Payment details, such as credit card information or bank account details, which are processed by a third-party service provider that handles payment on behalf of CoachU
- Information from or in connection with your resume or job application if you apply for a position with us
- Profile photographs
- Professional training, accreditations, or qualifications
- Australian Business Number (ABN)
- School affiliation
- Family relationship

3.2 We may collect and record Personal Information about individuals such as:

- Our tutors, students, potential students, and their parents or guardians
- Our suppliers and potential suppliers and their representatives, directors, partners, proprietors, and shareholders
- Contractors, subcontractors, and potential contractors and subcontractors and their representatives in relation to providing goods and services to us

- Our employees and independent contractors, past and present, including applicants
- Other people who have or may come into contact with CoachU

3.3 We are authorized to collect tax file numbers (TFNs) by the Income Tax Assessment Act 1936 (Cth). It is not compulsory for you to provide your TFN for our products and services, but if you do not, taxation law may require additional deductions from any amounts payable by you to us from time to time.

4. How We Collect Personal Information

4.1 We collect Personal Information to enable us to run the CoachU business and Platform, including to provide, market, sell, and improve our products and services and for the specified purposes set out in clause 5. In some circumstances, the collection of Personal Information may be required by law.

4.2 We may collect your Personal Information in the course of providing you with goods or services, or:

- When you use or buy our products or services
- When you provide us, or you offer or apply to supply us, with goods or services
- When you provide information to us in any way (including by completing a form, survey, entering a competition, or disclosing information over the phone or via email)
- When you request information about us, our products, or our services
- When you provide feedback to us
- When you visit or fill in a form on the CoachU Platform
- When you attend a tutoring session and/or correspond with a representative of CoachU
- When you (or your employer) provide that information to us in the course of conducting or administering our relationship with you, or when you are carrying out activities in connection with our business operations
- When you otherwise contact us by phone, email, social media, post, or in person
- Where we are otherwise required or authorized by law to do so

5. How We Use Your Personal Information

5.1 We may collect, hold, and use your Personal Information to:

- Identify and communicate with you
- Enable us to provide you with requested information, products, or services
- Match and allocate a student and a tutor
- Provide a tutor with a student's relevant information to connect and understand the specific requirements of a student
- Provide a student with access to lesson notes from a tutor
- Otherwise assist customers by providing them with information and support
- Collect and process payments
- Help us to manage and enhance products or services we provide to you
- Help us to manage and enhance goods and services we procure from our suppliers and subcontractors
- Help us manage and respond to a general or specific shareholder enquiry
- Process share applications and service shareholders' needs
- Provide facilities and services a shareholder may request
- Personalize and customize your experiences on the CoachU Platform
- Manage and administer any account you may hold with us
- Manage and maintain credit accounts for the provision of goods or services on credit
- Promote and market our products and services to you
- Provide you with information that we believe may be of interest to you or that you may be interested in receiving, including advertising material, regarding us, our clients, and our business partners
- Conduct research for the purposes of improving existing products or services or creating new products or services
- Help us research the needs of our customers to enable us to market our products and services with a better understanding of your needs and the needs of customers generally
- Notify and assess insurance claims, pay settlements, and finalize claims, and determine liability

- Protect you and us from fraud
- Provide for the safety and security of workers and onsite visitors
- Help us manage our business operations
- Assist with business support purposes including maintenance, backup, and audit
- Process any job application submitted by you
- Respond to any queries or complaints you may have
- Investigate, review, mitigate risks associated with, and inform you of a data or other security breach involving your personal information
- Comply with our statutory and legal obligations

5.2 For the avoidance of doubt, we may also collect and/or review, scan, or analyse your communications on the CoachU Platform for the purposes of fraud prevention, security investigations, risk assessment, regulatory compliance, product development, research, analytics, enforcement of our Terms and Conditions, and customer support purposes. In some cases, we may also scan, review, or analyse messages sent via the CoachU Platform to debug, improve, and expand our product offerings and/or to identify the impact severity of certain bugs affecting users on the CoachU Platform. Predominantly, CoachU will review, scan, or analyse communications on the CoachU Platform for the purpose of providing, and in response to a request for, customer support to users and to ensure the safety and security of users on the CoachU Platform.

5.3 Personal Information may be aggregated for internal and external reporting (including in compliance with local laws), for marketing and advertising, product and service improvement, and statistical and analytical purposes. Information might be identified or de-identified depending on the nature of the reporting and purpose for the use of the relevant data.

5.4 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law.

5.5 You consent to us using your Personal Information in the above ways and as set out in this Policy.

6. Disclosure of Your Personal Information

6.1 We may share your personal information with:

- Any of CoachU's tutors, internal divisions, business units, or departments
- Third-party vendors who assist in providing our services, such as payment processors and email service providers
- Banks, lenders, valuers, insurers, brokers, auditors, business consultants, and IT service providers
- Government, regulatory authorities, and other organizations as required or authorized by law

6.2 We may also disclose your Personal Information to the CoachU Platform host or software application providers in certain limited circumstances, for example when the CoachU Platform experiences a technical problem or to ensure that it operates in an effective and secure manner.

6.3 As we continue to develop our business, we may buy, merge, or partner with other companies or organizations, and in so doing, acquire customer Personal Information. In such transactions, Personal Information may be among the transferred assets. Similarly, in the event that a portion or substantially all of our business or assets are sold or transferred to a third party, we may also disclose certain information, including your Personal Information, to a purchaser or potential purchaser in connection with the sale or potential sale of us, our business, or any of our assets, including in insolvency.

6.4 Some of your Personal Information may be disclosed, transferred, stored, processed, or used overseas by us or by third-party service providers. This may happen if:

- Our offices or related entities are overseas
- We outsource certain activities overseas
- Transactions, information, services, or products have an overseas connection
- Our computer systems, including IT servers, are located overseas

7. Information Collected via CoachU Platform

7.1 Third-Party Content

- Some content on the CoachU Platform may include applications made available by third parties, such as social media buttons, links to third-party applications (such as an online lesson platform), or links that allow you to share content or links to the CoachU Platform through the relevant third-party platforms.
- Third-party applications themselves may facilitate the collection of information through your interaction with the applications and sometimes even if you do not interact directly with them.
- We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third-party websites to understand their privacy practices and options they may make available to you in relation to their collection of your Personal Information.

7.2 Legal and Business Matters

- We may share your personal data to respond to judicial processes or provide information to law enforcement or regulatory agencies or in connection with an investigation on matters related to public safety, as permitted or required by law. We may also share your personal data if we believe there has been a violation of our Terms and Conditions, our rights, or the rights of any third party.
- In the event that we, or any of our businesses, are sold or disposed of, whether by merger, sale of assets, or otherwise, or in the event of insolvency, bankruptcy, or receivership, your personal data may be one of the assets sold or merged in connection with the transaction.

8. Marketing

8.1 You consent to us using your Personal Information for sending you information, including promotional material, about us or our products and services, operational updates or changes to products and services (whether temporary or permanent), as well as the products and services of our related entities and third parties, now and in the future. You

also consent to us sending you such information by means of direct mail, email, SMS, and MMS messages.

8.2 If you do not want to receive marketing information from us, you can unsubscribe in any of the following ways:

- Clicking on the 'Unsubscribe' or subscription preferences link in a direct marketing email that you have received from us
- Logging into your account on the CoachU Platform and editing your communication preferences
- Contacting us using the contact details specified in clause 12

8.3 We may also send you email messages about the status of your account or any notices as required by law. You may not opt-out of receiving these administrative emails so long as you continue to use this voluntary service. If you wish to terminate your account, please contact us.

9. Data Security

9.1 We aim to keep your Personal Information secure. Any Personal Information that is collected via the CoachU Platform or which is held on our computer systems is protected by safeguards including physical, technical (firewalls, SSL encryption), and procedural methods.

9.2 Unfortunately, even with these measures, CoachU cannot guarantee the security of Personal Information. By using the CoachU Platform, you acknowledge and agree that CoachU makes no such guarantee, and that you use the CoachU Platform at your own risk.

9.3 If we find that we no longer require or have no further need for your Personal Information, we may de-identify it or remove it from our systems and destroy all record of it.

10. Accessing and Updating Your Personal Information

10.1 You are generally entitled to access Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you

full access to your Personal Information. Depending on the nature of the request, CoachU may charge for providing access to this information; however, such a charge will not be excessive. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where we are required by law to give those reasons.

10.2 A request for access can be made by contacting CoachU in any of the ways specified in clause 12.

10.3 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete, and up-to-date. To assist us in this, you need to provide true, accurate, current, and complete information about yourself as requested and properly update the information provided to us to keep it true, accurate, current, and complete.

10.4 Please contact us in any of the ways specified in clause 12 if you believe that the Personal Information is inaccurate, incomplete, or out of date, and we will use all reasonable efforts to correct the information.

11. Updates to This Privacy Policy

11.1 We may update this Privacy Policy from time to time. Any changes will be posted on this page with an updated revision date. We encourage you to check this page from time to time for any changes.

12. Contact Us

Please contact us at admin@coachuaustralia.com.au if you:

- Have a query or concern about this Policy or our Personal Information handling processes
- Wish to make a complaint in relation to a breach of your privacy
- Would like to access your Personal Information held by us
- Would like to update or correct your Personal Information held by us
- Would like to opt out of direct marketing

This policy is effective as of 15 July 2024.