

PRIVACY POLICY

WEWORKBOOK AND STUDENT LEARNING PORTAL

The “Weworkbook” website located at www.Weworkbook.com, all websites with the prefix www.Weworkbook.com (the “**Website**”) and any associated software applications including the Student Learning Portal (the Website and applications together the “**Platform**”), are owned, controlled and operated by DNA Progression Pty Ltd (ACN 119 970 357) atf the DNA Progression Trust.

DEFINITIONS

Below are some key definitions used throughout this privacy policy (the “**Privacy Policy**”). Other capitalised terms in this Privacy Policy have the same meaning as in the Terms of Use for the Platform located at [Platform Terms of Use](#) (“**Platform Terms of Use**”).

- When we say “**we**”, “**Weworkbook**”, “**our**”, or “**us**”, we mean DNA Progression Pty Ltd (ACN 119 970 357) atf the DNA Progression Trust, and our officers, employees, contractors, agents, licensees and other representatives.
- When we say “**you**” or “**User**”, we mean any person who accesses, browses or uses the Website (whether or not you have registered as a **Subscriber, Representative**) or **Student**, or lodges an enquiry on the website of a Subscriber.
- When we say a “**Third Party Personal Information**”, we refer to Personal Information supplied by a User that relates to an individual who is not that User.
- When we say “**Third Party**”, we mean the individual who is identified or identifiable by the Third Party Personal Information.
- When we say the “**Privacy Act**”, we mean the *Privacy Act 1988* (Cth) as amended by the *Privacy Amendment Act 2000* (Cth) and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth).
- When we say “**Personal Information**”, we mean that term to include any information or opinion, whether true or not, about a person who is identified or whose identity can reasonably be established, and not limited to information in a

material form, and includes Sensitive Information (as defined in clause 3 below) and Third Party Personal Information (as defined above).

In order for us to operate the Platform, we need to handle Personal Information. We take the privacy of Personal Information seriously. We comply with the **Privacy Act** as a matter of best practice.

The Privacy Policy should be read in conjunction with the Terms and Use and the Website Terms and Conditions available at [General Website Terms and Conditions](#) (the “**Website Terms and Conditions**”).

This Privacy Policy may change. If we change this Privacy Policy, we will display notice of changes on our Platform. Please check for updates regularly. If a User inputs Third Party Personal Information into the Platform, the User should also supply those updates to the Third Party or otherwise inform the Third Party to check for updates.

IMPORTANT WARNING

Users who do not consent to us collecting, handling or using their Personal Information in accordance with this Privacy Policy should not use this Platform.

Users MUST obtain consent from the relevant Third Party prior to inputting Third Party Personal Information into the Platform. If the relevant Third Party does not consent or otherwise agree with the terms of this Privacy Policy, the User should not collect and input the Third Party Personal Information into the Platform. We recommend that a User’s own privacy policy is updated so as to obtain consent from any such Third Parties to our handling, collecting and using their Personal Information in accordance with this Privacy Policy.

We can be contacted via support@Weworkbook.com with any questions about the application and scope of this Privacy Policy.

1. Application and Consent

This Privacy Policy sets out how we collect, handle and use Personal Information in connection with our operation of this Platform (different privacy policies apply to the different software and websites that we operate).

If a User wishes to collect and input Third Party Personal Information into the Platform, the User must firstly obtain consent from the relevant Third Party and supply them with a copy of this Privacy Policy.

By using the Platform, you hereby consent to our collection, use and disclosure of Personal Information which is governed by the terms of this Privacy Policy and

you warrant that you have obtained all relevant consents and permissions to provide us with any Third Party Personal Information you input into the Platform.

It is important to note that that:

- a. Users who do not agree to the terms of this Privacy Policy should immediately stop using the Platform.
- b. Any Third Parties who do not agree to the terms of this Privacy Policy should not allow Users to input their Personal Information into the Platform;

Users who intend to supply or input Third Party Personal Information MUST first obtain consent from the relevant Third Party and supply them with a copy of this Privacy Policy. In the case of a Subscriber and a Student, the Subscriber must draw the Student's attention to the following:

- a. The Subscriber and their Representatives will be able to access all Student Uploads by that Student;
- b. All Personal Information relating to that Student will be viewable and downloadable by Weworkbook, the Subscriber and the Subscriber's Representatives; and
- c. Personal Information relating to that Student may be exported as part of Output Data and shared by the Subscriber with government agencies and other bodies of authority in order to meet AVETMISS and other Legal Requirements.

If a Third Party does not provide a User with such consent or does not agree to us handling, collecting and using Third Party Personal Information in accordance with this Privacy Policy, the User must not supply us with the Third Party Personal Information via the Platform.

2. Supply of Personal Information

Before supplying any Personal Information via the Platform, Users should ensure that there are no restrictions on them doing so.

We are not responsible for any mistake or negligence or other conduct on a User's part where they supply Personal Information which they are not entitled to supply, but we will take reasonable steps to destroy or de-identify any such wrongfully supplied Personal Information within a reasonable timeframe after they have given us notice.

3. What kinds of information do we collect on the Platform?

The kinds of Personal Information we may collect about Users and Third Parties include their name, address, e-mail address, telephone number, occupation, gender, age, date of birth and financial information.

A Subscriber may use the Platform to ask a User to provide the following information:

- a. Information or an opinion about their health, including an illness, disability or injury, or a health service that has been or will be provided to them;
- b. Information about their racial or ethnic origin; and/or
- c. Information about their religious beliefs or affiliations or philosophical beliefs.

(**“Sensitive Information”**).

However, we do not directly solicit Sensitive Information.

We may also collect non-personal statistical information, in accordance with clause 12 below.

4. How do we collect Personal Information from Users?

We collect Personal Information where reasonably necessary for the proper function of the Platform. The ways in which we may collect Personal Information include:

- a. When Users register an account for use of the Platform;
- b. From third party payment services when details of a User’s transactions on the Platform are provided to us;
- c. From Users as part of using the functionality of the Platform, such as storage of Third Party Personal Information in connection with operating a Registered Training Organisation;
- d. When a User makes an enquiry on a Subscriber’s website, which is automatically forwarded to us;
- e. When Users sign up to the mailing list provided on our Website; and
- f. From Users through any use we may make of browser ‘cookies’ or trackers on the Website.

This Privacy Policy does not exhaustively list the ways in which we may collect Personal Information or the kinds of Personal Information we may collect.

5. How do we use Personal Information once we have collected it?

Users agree that we may use or disclose Personal Information we collect for the following purposes:

- a. To understand usage trends and patterns and improve Users' overall experience of the Platform;
- b. To fix problems and respond to feedback and complaints;
- c. To enforce any agreements between a User and us, such as the Website Terms and Conditions or the Terms of Use;
- d. To allow us to run the Platform and perform administrative and operational tasks; and
- e. To provide Users with Output Data and other relevant information.

Users agree that we will be entitled to disclose Output Data generated by the Platform (which may embody their Personal Information and Third Party Personal Information) to relevant Users and those Users shall have rights to distribute, copy and otherwise use the Output Data in accordance with the Platform T&Cs.

We will not sell or license Personal Information to any third parties, however we may share and license non-personal statistical data to third parties, including analytics and research entities. We endeavour to aggregate this data in such a way as will de-identify individual Users.

In addition, the Privacy Act caters for particular situations called "Permitted General Situations" where Personal Information may be disclosed outside of the purposes listed above, such as to lessen or prevent a serious threat to public health or safety, or to assist in locating missing people. Other laws, or a court, might also legally compel us to disclose Personal Information.

6. How do we store Personal Information?

We may store Personal Information in a variety of ways including in the cloud or other types of networked or electronic storage.

We may store and make back-up copies of Personal Information to ensure that we are able to recover information if our systems experience a fault or outage.

7. Are we going to contact you with direct marketing?

We may use Personal Information to directly respond to enquiries lodged by visitors to the websites of Subscribers, notify Users of new developments to the Platform, offer Subscribers and their Representatives new products and services, or send Subscribers and their Representatives other commercial communications.

By continuing to use the Platform, Users hereby consent to receiving such marketing communications. In delivering such communications, we may contact Users via e-mail. If a Subscriber or Representative does not wish to receive direct marketing communications from us, you may **opt-out** by contacting support@Weworkbook.com. We will always give Subscribers and their Representatives an opportunity to opt-out of receiving future marketing communications.

We will not directly contact Third Parties without the consent of the Third Party.

8. Are we responsible for the way Users handle Third party Personal Information?

We are not liable nor responsible for the way that Users collect, handle or use Third Party Personal Information. This is entirely the responsibility of the relevant User.

We cannot guarantee that Users (or any organisation of which they are associated) will treat Third Party Personal Information confidentially (whether it is incorporated into Output Data or not), as this is beyond our control.

9. How will our payment provider handle Personal Information?

Any handling of Personal information disclosed to any payment provider we may use via the Platform is out of our control and is entirely the responsibility of that payment provider. We will not be liable nor responsible for the payment provider's handling of Personal Information.

We recommend that Users make enquiries as to how our payment provider will handle Personal Information to be provided by that User (by, for example, requesting a copy of the payment provider's privacy policy).

10. Are we responsible for the privacy practices of other third parties, where we provide links to those third parties, or redirect Users to those third parties?

This Privacy Policy applies solely to information collected by us with regard to the Platform. We take no responsibility for the privacy practices of any third parties that we may link to on the Platform.

11. Can Users and Third Parties access their Personal Information, and correct it if it is wrong?

Individuals can ask us to provide them with a copy of the Personal Information we hold about them. They do not need a reason for asking, but we may charge for our reasonable expenses for preparing and sending a copy of the requested Personal Information. We will try to respond to any such request within a reasonable timeframe. If the request would have an unreasonable impact on the privacy of others, the information is commercially sensitive, giving access would be unlawful or the request is frivolous or vexatious, we may not give the Personal Information requested.

We will take reasonable steps to see that the Personal Information we collect and store is accurate, up-to-date and complete. To assist us, Users and Third Parties should provide correct details where requested for upload to the Platform, and let us know if they believe the information we have is inaccurate, incomplete, out-of-date or misleading. If Users or Third Parties believe the information is false or inaccurate, they have a right to have this corrected and we will endeavour to do so within a reasonable timeframe, at no expense to the relevant individual.

12. How do we keep Personal Information secure?

We take the security and safety of Personal Information seriously. We will take all reasonable steps to protect Personal Information from misuse, interference and loss, and unauthorised access, modification or disclosure. Unfortunately, no data transmission over the internet can be guaranteed to be completely secure and we cannot guarantee that Personal Information will only be viewed by persons who they wish to view their Personal Information. We also cannot guarantee that the Platform will be completely free from viruses, surveillance or interception.

We will take reasonable steps to destroy or de-identify Personal Information when we do not need it. However, it is each User's responsibility to ensure that they do not provide us with any Personal Information that we did not request. We may retain and use de-identified information.

13. Do we use cookies, trackers and analytics?

We may use "cookies" to store data on a User's device when they access the Platform. The information stored in the cookie would be used to identify a User's device. We use this information in order to enable us to operate an efficient service, to track the patterns of behaviour of Users of the Platform and to collect

statistical information about visitors to the Platform, including but not limited to IP addresses, geographical location, how Users arrived at the Platform and information about the device being used to access the Platform such as the browser, operating system and/or mobile device type. We would collect this information in order to improve our Platform, direct the most appropriate content to Users and remember a User's preferences for next time they access the Platform.

Please note that Users are able to opt out of cookie technology through changing the settings on their browser, but this may affect the way Users experience our Platform.

We also use Google Analytics to collect statistical information about access to the Platform, to help us improve our Platform.

14. Will we transfer Personal Information to anybody?

If we change our business structure (for example by incorporating, or by bringing on board new partners), then, in our sole discretion, we may transfer, sell, license or assign Personal Information collected to one or more relevant third parties. This may make Personal Information subject to a different privacy policy and if that is the case, we will post notice of this on the Platform.

15. Who can I contact with questions and complaints regarding this Privacy Policy?

If you have any questions or if you think something is not quite right, please contact us at any time by emailing support@Weworkbook.com.

16. Further information

For further information on online privacy rights, please contact the Office of the Australian Information Commissioner:

Online: www.oaic.gov.au/privacy

Phone: [1300 363 992](tel:1300363992)

Email: enquiries@oaic.gov.au