

TREETOP EARLY LEARNING - PRIVACY POLICY

1. OUR PRIVACY POLICY

We at Treetop Early Learning (Treetop Early Learning Pascoe Vale Pty Ltd ACN 667 582 532) (also referred to as “we” or “our” or “us” or “Treetop”) understand that you care about how your personal information and data is used and shared. We recognise your right to control how we collect, use and share your personal information. We take the privacy of your personal information very seriously and as such this Privacy Policy outlines our ongoing obligations to you in respect of how we manage your personal information through our website [treetop.com.au](https://www.treetop.com.au) (“the Website”) and the services that we offer. This Privacy Policy in no way is intended to limit your rights under the *Privacy Act 1998* (Cth) (“the Privacy Act”).

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act. The APP 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 <https://www.oaic.gov.au/>.

This Privacy Policy does not apply to acts or practices of Treetop that are directly related to employee records of current or former employees, or information about companies, individual partners or sole traders acting in a business capacity.

2. WHAT IS PERSONAL INFORMATION?

Personal information is information or an opinion (whether true or not) that identifies an individual. Examples include names, addresses, email addresses, phone and facsimile numbers.

3. WHAT PERSONAL INFORMATION DO WE COLLECT?

Treetop will collect the following personal information:

Families

The information we collect about families includes your contact details (name, address, email, and telephone numbers), drivers’ license number, date of birth, Medicare details, relationship to the child, financial information, employment details, evidence of guardianship or parental responsibility and, where relevant, information pertaining to child custody and access arrangements, and Child Care Benefit details. For corporate users we also collect salary sacrifice information.

Children

Information we collect about children attending our services include gender, proposed and actual attendance days and dates, information about languages spoken by the child including in the child’s home, any school enrolment details, photos and learning documents. We collect information about the child’s development, routines, preferences and interests. We also collect information about sleep and food preferences, special needs and information about how we can best communicate and care for your child.

Other individuals

We collect information about other individuals you would like us to interact with about your child, including additional emergency contacts and individuals you agree may collect your child from our services. For these individuals we will collect names, relationship to the child, address, telephone numbers and email addresses. We also collect the name and relationship to your child of any siblings or family members that live in your household, and details of people who have contact with your child that are important for us to know.

Early childhood professionals and other jobseekers

For those seeking employment with Treetop, we collect your contact details (name, address, email, and telephone numbers), details of your current employment (job status, employer, job title and current salary) and details about your preferred position with Treetop. For identification verification, to ensure the best education and care for the children attending our services and to comply with the Education and Care Services National Law and Regulations, we will collect copies of your identification, qualifications and Working With Children clearance. We may also collect evidence of your ability to work in Australia, including residency or visa details. We will ask where you heard about us and our advertised positions.

We will also collect information about jobseekers' referees and will contact referees to help us determine a person's suitability for employment or engagement with Treetop. The information we collect about referees includes contact details (name, telephone numbers and email address) and information provided by referees during reference checks.

We may collect contact information from early childhood professionals at professional events, which we will use to contact you about future recruitment opportunities with Treetop.

If you provide us with personal information about your child, partner or any other person, that person's permission must first be obtained before you provide us with the relevant information and they should be provided with a copy of this Privacy Policy.

4. WHY DO WE COLLECT PERSONAL INFORMATION?

The personal information that Treetop collects about you will only be information that is reasonably required for Treetop to provide you with services and comply with the laws and regulations for providing education and childcare services. This includes:

- processing enquiries and applications for enrolments;
- providing education and care services;
- providing you with information about Treetop and the education and care we provide;
- providing you with information about Treetop and employment opportunities we have; and
- managing applications from individuals seeking to work at Treetop.

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.

Given the type of service that we provide, it is impractical for us to deal with individuals who have not identified themselves. However, you may choose to remain anonymous or use a pseudonym when dealing with us when requesting general information or pricing. If you do not wish to provide the

information that we have requested we will tell you if there are any consequences of not doing so, including how it will affect the education and care services we are able to provide. Treetop is required by law to collect some personal and sensitive information. If you choose not to provide us with information we are required to collect under law, we may not be able to provide you with education and care services.

5. SENSITIVE INFORMATION

Sensitive information is defined in the Privacy Act to include information or opinions about such things as an individual's health information, 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.

Treetop will collect sensitive information with your consent. However, we are required to collect some sensitive information under the Education and Care Services National Law and Regulations. We will collect health information about your child including your child's medical and health history (including information about any incident, injury, trauma or illness sustained) information about allergies and anaphylaxis, information about prescribed medications, immunisation details, disabilities, medical management plans, the name and contact details of the child's doctor(s) and dentist, any intervention services used, your child's Medicare Number and Ambulance Membership number.

We will also collect information about the cultural background of your child, and if applicable, about the child's parents. We will collect sensitive information about any special considerations for your child, for example, any cultural, religious or dietary requirements or additional needs.

6. HOW DO WE COLLECT PERSONAL INFORMATION

Treetop will only collect the personal information of individuals that they provide to us with their consent unless otherwise stated in this Privacy Policy. We collect your information through our standard forms, including enrolment forms, via our websites (including tour booking forms, enrolment enquiry forms and event registration forms), via the 'My Waitlist' website, via social networking sites, through written communication with you such as email or through talking with you, including when we talk over the telephone.

Sometimes it may be unreasonable or impracticable to collect personal information from you directly and in these instances, we may collect your personal information indirectly. If we do collect personal information about you indirectly, we will take reasonable steps to let you know that we have or will do this.

7. USE AND DISCLOSURE OF PERSONAL INFORMATION

We only collect personal information that is reasonably necessary for us to fulfil our functions and activities. We will use the personal information we collect to provide education and care services, communicate with you about your child, manage enrolments for your child, provide you with information about Treetop and education and care services, to invite you to provide us with information about our services and to manage applications for employment with us.

For early childhood professionals and other jobseekers, we may use your personal information to contact you about potential employment opportunities with Treetop.

We will disclose the personal information we collect for the purpose we collected it for, or for a secondary purpose that is reasonably expected or related to the purpose that we collected it for. Staff and volunteers at Treetop sign a confidentiality statement prior to engagement with us. The Centre Manager at your service will ensure that information about you and your child is only disclosed in accordance with this Privacy Policy.

Treetop has relationships with corporate clients to provide employees with education and care services. If you are employed by one of our corporate clients, we will disclose your personal enquiry information (including details about your employer, date of your centre tour, and employment location), the date of your child's enrolment, and the number of days/hours of care used by you to your employer. This information is used to verify your employment with your employer, for invoicing purposes and for reporting purposes to help our corporate clients better serve their employees. We may disclose your personal information to a State/Territory regulatory authority, as required by the Education and Care Services National Law and Regulations or in accordance with child protection or other laws.

With your consent, we may disclose your personal information or your child's personal information to individuals or agencies. We may seek your consent to disclose information to inclusion support workers or medical staff. In the case of an emergency, if we are unable to contact you, we may disclose information about you or your child to a registered medical practitioner or emergency service.

We may disclose your personal information to companies that assist us with our business, for example credit report bodies, legal representatives, collection agencies, information technology providers and mailing houses. Some service providers we use may be located outside of Australia or use systems that are located outside of Australia. We will take reasonable steps to enquire that the service providers comply with the Australian Privacy Principles.

Treetop will display medical condition emergency plans for children in services. We will only display other information that would be within your reasonable expectations, or with your consent.

Your personal information may be disclosed to other third parties where you authorise us to do so or where required or authorised by law.

Treetop does not and will not rent or sell your personal information in personally identifiable form to anyone. Treetop will not disclose your personal information to overseas recipients.

8. SECURITY OF PERSONAL INFORMATION

We take the security of your personal information very seriously. We will take reasonable steps to protect your personal information from loss, unauthorised access, use, modification or disclosure.

However we cannot guarantee the complete security of your personal information where circumstances are outside the control of Treetop. Your personal information will be stored in our secure systems. Your personal information will be kept confidential. We use a range of security measures to protect personal information held at both the service and at our support office.

Non-current records will be archived and stored according to requirements under the Education and Care Services National Law and Regulations.

Enrolment records for the previous 12 months, as far as practicable, will be kept confidential at the Treetop centre your child is enrolled at per the National Quality Framework requirements.

Child enrolment records are stored in a safe and secure place at the Treetop centre your child is enrolled at for 3 years after the last date on which your child is educated and cared for by Treetop per the National Quality Framework requirements.

Our website may contain links to third party websites. We are not responsible for privacy practices of a third-party website. If you click on a link that directs you to another website, you should read their privacy policy.

9. ACCESSING AND CORRECTING INFORMATION

You can request at any time access to the personal information that we hold of you free of charge. To access the personal information that we hold about you, you should contact your Centre Manager or our support office. Details of our support office can be found at section 12 of this Privacy Policy. We may require identification from you prior to releasing the requested information. We cannot provide you with the personal information of others. If we refuse to provide you with the requested information, we will let you know the reasons why.

If we become aware that any personal information that we hold is incorrect or out of date, we will take reasonable steps to correct it. If you believe that any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, please contact us and we will take all reasonable steps to correct the information.

You can request that we delete your personal information by contacting your Centre Manager or our support office (the details of which can be found at section 12 of this Privacy Policy). We may require identification documents from you to confirm your identity. If you request us to delete your personal information, we may not be able to provide you, or continue to provide you with our education and childcare services.

10. USE AND COLLECTION OF TECHNICAL INFORMATION

When you visit and browse the Website, we use Google Analytics to collect general information that enables us to continually provide a more meaningful experience. This general information is not capable of identifying you with other data held by Google. This information is collected through code embedded in the webpages of this website. For more information, visit the Google Privacy Policy – <https://www.google.com.au/intl/en-GB/policies/privacy/>.

Other information, such as browser type, is included in a 'cookie' that is sent to your computer when you are completing certain tasks online. Cookies are an industry standard and most major websites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. Cookies are designed to provide a better, more customised website experience, and to make it easier for you to use websites. You may refuse the use of cookies by selecting the appropriate settings on your browser.

We may also use technologies similar to cookies in emails you receive either directly from us or from third party email providers sending emails on our behalf. These technologies help us understand whether you have opened and interacted with the email. They help us understand what you may find of interest. If you prefer not to be tracked in this way you can disable HTML images or refuse HTML (select Text only) within your email software, and you should not click on any links within the email (with the exception of the unsubscribe link). You can opt-out from receiving these emails from us at any time by clicking on the 'unsubscribe' link within the email.

11. CHANGES TO THIS POLICY

We may amend, update or review this Privacy Policy from time to time as necessary. We will notify you in the event this Privacy Policy has changed. You will continue to be bound by the updated Privacy Policy when you use the Website after the changes have been posted. The most recent and current Privacy policy supersedes all prior Privacy Policies.

If you require a copy of this Privacy Policy in a specific form, please contact your Centre Manger or our support office (details of which can be find in section 12 of this Privacy Policy) and we will endeavour to assist you with this request.

12. QUESTIONS, CONCERNS OR COMPLAINTS

If you have any questions, concerns or complaints regarding this Privacy Policy, please contact your Centre Manager or our support office. Our support office can be contacted at:

Tree Top Early Learning

PO Box 210, North Essendon VIC 3041 Phone: 03 8652 8088 Email: pascoevale@treetop.com.au

Please provide a detailed message and we will attend to your matter at our earliest to resolve any question, concern or complaint you have.

We may require further information for complaints you may have about our Privacy Policy. We may also require further information about you to assist us in attending to and resolving your complaint. We may discuss your complaint with employees of Treetop to assist you and resolve your complaint. We will do our best to respond to your complaint promptly. We aim to resolve any complaint within 30 days. If your complaint involves a complex matter or requires Treetop to investigate your matter further we may require more time to deal with your complaint.

If we are unable to resolve your complaint in an appropriate amount of time, or if you are not satisfied with our response to your complaint you can lodge your complaint to the Office of the Australian Information Commissioner (OAIC). Information on how to make a complaint with the OAIC and the contact details of the OAIC can be found at:

GPO Box 5218 Sydney NSW 2001 Phone: 1300 363 992 Email: enquiries@oaic.gov.au Website: www.oaic.gov.au.

Last update to this Privacy Policy: August 2023