

Website Privacy Policy

Directions Coaching & Counselling (ABN 72 797 213 381) provides access to online grief and loss courses and related products and counselling services. This Privacy Policy applies to your interactions with, and all personal information collected and used in connection with the services and in your use of the Directions Coaching & Counselling website located at <http://www.dianahutchison.com>.

1.1 What is “personal information”?

- (a) The Privacy Act 1988 (Cth) currently defines “personal information” as meaning information or an opinion about an identified individual or an individual who is reasonably identifiable:
 - whether the information or opinion is true or not; and
 - whether the information or opinion is recorded in a material form or not.
- (b) If information do not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “personal information” and will not be subject to this privacy policy.

2 What information do we collect?

The kind of personal information, sensitive information (such as age, gender, race, sexuality or religion) and health information (such as information about your mental health and symptoms experienced), that we collect from you will depend on how you use the website and the kind of service you request from us but will typically include:

- Your name, your date of birth, your gender, IP address, your geographic location, your email address, your telephone number, your credit card or other payment details, your billing address, support queries, survey responses, and other contact;
- Information about your mental health as well as details of issues which you have been discussing with your counsellor. These communications are confidential and kept in order to enhance the quality of the services you receive;
- Any additional personal information you provide to us, or authorise us to collect, as part of your interaction with Directions Coaching & Counselling and provision of the services;
- Our services are not directed to persons under the age of 18 and we do not knowingly collect personal information or sensitive information from anyone persons under 18. If we become aware that a minor under the age of 18 has provided us with personal information or sensitive information we will delete the same immediately. If you are a parent or guardian of a minor and you believe they have provided us with personal information or sensitive information without your consent then please notify us.

3 How we collect your personal information

- We may collect personal information, sensitive information or health information from you whenever you input such information into the website, via web forms, by telephone, when users visit our site, your response to surveys including but not limited to feedback surveys, fill out forms, via video conferencing during, counselling sessions, and in connection with other activities, services and resources made available on the website and in connection with the provision of our services.
- We also collect cookies from your computer which enable us to tell when you use the website and also to help customise your website experience. As a general rule, however, it is not possible to identify you personally from our use of cookies.

4 Purpose of collection and use

- The purpose for which we collect personal information and/or sensitive information and health information is to provide you with relevant and informed services and related administrative and management functions and to provide you with the best service experience possible on the website.
- We only use or disclose the information for the primary purpose for which it was collected or for a directly related secondary purposes which could be expected such as responding to requests for information, managing, planning and advertising and administering course content and related counselling services, events, competitions and performances, researching and expanding our facilities and services, informing you of our activities, events, facilities and services, recruitment processes and responding to inquiries and complaints.
- All personally information, sensitive information and health information collected for the provision of the services will remain confidential and secure except where we are compelled by law to release it such as if it is subpoenaed by a court or where failure to disclose the information would place you or other person at risk or else where your prior written consent has been provided.
- We customarily disclose personal information only to our service providers who assist us in operating the website. Your personal information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.
- By using our website you consent to the receipt of direct marketing material. We will only use your personal information for this purpose if we have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from use. We do not use sensitive personal information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature.

5 Access and correction

Australian Privacy Principle 12 permits you to obtain access to the personal information we hold about you in certain circumstances, and Australian Privacy Principle 13 allows you to correct inaccurate personal information subject to certain exceptions. If you would like to obtain such access, please contact us as set out below.

6 Complaint procedure

If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact us as set out below. All complaints will be considered by our Privacy Officer and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

7 Overseas transfer

Your personal information may be transferred to recipients located in the UK or the USA which have data protection laws which protect personal information in a way which is at least substantially similar to the Australian Privacy Principles, and there will be mechanisms available to you to enforce protection of your personal information under that overseas law. In the circumstances, we do not require the overseas recipients to comply with the Australian Privacy Principles and we will not be liable for a breach of the Australian Privacy Principles if your personal information is mishandled.

8 GDPR

In some circumstances, the European Union General Data Protection Regulation (**GDPR**) provides additional protection to individuals located in Europe. Where this is the case, there may be additional rights and remedies available to you under the GDPR if your personal information is handled in a manner inconsistent with that law.

9 How to contact us about privacy

If you have any queries, or if you seek access to your personal information, or if you have a complaint about our privacy practices, you can contact us via email on info@dianahutchison.com.