

Website Privacy Policy

Version 1.0

Summary: This policy outlines the privacy practices for The Cram Foundation and our website <https://www.cramfoundation.com.au> for all employees, contractors, service providers and third parties either supporting or utilising the Cram website .

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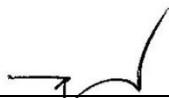
Document Approval

This Policy has been endorsed by the CEO and approved by the Board as indicated by the signatures below



Karen Burdett, CEO

Date: 22 May 2023



Linda Wright, Board Chair

Date: 22 May 2023

Document Control

DocID	POL2023_022
Document Name	Website Privacy Policy
Version	1.0
Document Owner	Business Optimisation Manager
This document replaces	NA
Document status	Published
NDIS Quality Standard	Provider Governance and Operational Management
Approved	22/05/2023
Published	23/05/2023
Published Location	Teams>CRAM all staff>Policies, Procedures, Forms and other documents

NOTE: Date published is the date this document commences

Under the Cram policy framework, policy and process indicate what must be done and why; procedures indicate how the process needs to be done (including by who and by when); work/practice instructions explain how to carry out specific elements of the procedure/process. Supporting Documents (forms and other records) provide evidence of policy application and procedure outcomes.

Website Privacy Policy

Version 1.0

Policy Statement:

A privacy policy is a written, published statement that articulates the policy position of an organization on how it handles the personally identifiable information that it gathers and uses in the normal course of business. The policy should include information relating to the processes of information collection, analysis, maintenance, dissemination, access, expungement, and disposition.

The purpose of the policy is to articulate publicly that The Cram Foundation will adhere to legal requirements and policy determinations that enable gathering and sharing of information to occur in a manner that protects personal privacy interests. A well-developed and implemented privacy policy uses resources wisely and effectively; protects the organization and the individuals; and promotes public trust.

Policy

1. Privacy Notice

This privacy notice discloses the privacy practices for The Cram Foundation and our website <https://www.cramfoundation.com.au/>. This privacy notice applies solely to information collected by this website, except where stated otherwise. It will notify you of the following:

- What information we collect;
- With whom it is shared;
- How it can be corrected;
- How it is secured;
- How policy changes will be communicated; and
- How to address concerns over misuse of personal data

2. Information Collection, Use, and Sharing

We are the sole owners of the information collected on this site. We only have access to/collect information that you voluntarily give us via email or other direct contact from you. We will not sell or rent this information to anyone.

We will use your information to respond to you regarding the reason you contacted us. We will not share your information with any third party outside our organization, other than as necessary to fulfill your request (e.g. order fulfillment).

Unless you ask us not to, we may contact you via email in the future to tell you about specials, new products or services, or changes to this privacy policy.

2.1 Information You Provide to Us:

- From Websites or Events: We may collect any Personal Information that you choose to send to us or provide to us, for example, if you use an online form or if you register for a The Cram Foundation webinar. If you contact us through the Websites, we will keep a record of our correspondence.

- From the Services: We receive and store the information you provide directly to us. For example, when setting up new users, we collect Personal Information, such as name and email address, to provide them with the Services. The types of information we may collect directly from our customers and their users include names; usernames; email addresses; postal addresses; phone numbers; job titles; transactional information (including services purchased); as well as any other contact or other information they choose to provide us or upload to our systems in connection with the Services.

2.2 Information We Automatically Collect:

- When you use the Websites: When you visit the Websites, we collect certain information related to your device, such as your device's IP address, referring website, what pages your device visited, and the time that your device visited our Website.
- When you use the Services:
 - Usage Information – we keep track of user activity in relation to the types of Services our customers and their users use, the configuration of their computers, and performance metrics related to their use of the Services.
 - Log Information – we log information about our customers and their users when you use one of the Services including Internet Protocol ("IP") address.
 - Information collected by cookies and other similar technologies – we use various technologies to collect information which may include saving cookies to users' computers.
 - Customer Feedback – while using the Services, you may be asked to provide feedback (e.g. in the software directly or after receiving help from our support team). Providing this feedback is entirely optional.

3. Your Access to and Control Over Information

You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us via the email address or phone number provided on our website:

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

4. Registration

In order to use this website, a user must first complete the registration form. During registration a user is required to give certain information (such as name and email address). This information is used to contact you about the products/services on our site in which you have expressed interest. At your option, you may also provide demographic information (such as gender or age) about yourself, but it is not required.

5. Sharing

We share aggregated demographic information with our partners and advertisers. This is not linked to any personal information that can identify any individual person.

And/or:

We partner with another party to provide specific services. When the user signs up for these services, we will share names, or other contact information that is necessary for the third party to provide these

services. These parties are not allowed to use personally identifiable information except for the purpose of providing these services.

6. Security

We take precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline.

Wherever we collect sensitive information, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser or looking for "https" at the beginning of the address of the web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (e.g. customer service) are granted access to personally identifiable information. The computers/servers on which we store personally identifiable information are kept in a secure environment.

7. Cookies

We use "cookies" on this site. A cookie is a piece of data stored on a site visitor's hard drive to help us improve your access to our site and identify repeat visitors to our site. For instance, when we use a cookie to identify you, you would not have to log in a password more than once, thereby saving time while on our site. Cookies can also enable us to track and target the interests of our users to enhance their experience on our site. Usage of a cookie is in no way linked to any personally identifiable information on our site.

Some of our business partners may use cookies on our site (e.g., advertisers). However, we have no access to or control over these cookies.

8. Links

This web site contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

9. Surveys & Contests

From time to time our site may request information via surveys or contests. Participation in these surveys or contests is completely voluntary and you may choose whether to participate and therefore disclose this information. Information requested may include contact information (such as name and address), and demographic information (such as zip code, age level). Contact information will be used to notify the winners and award prizes. Survey information will be used for the purpose of monitoring or improving the use and satisfaction of this site or our services.

10. Notification of Changes

The Cram Foundation will notify consumers whenever material changes are made to the privacy notice.

11. Your Privacy Rights

11.1 What choices do I have?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

11.2 How can I exercise my data subject rights?

If you would like to access, review, update, rectify, and delete any Personal Information we hold about you, you can contact us by emailing admin@cramfoundation.com.au and advise us.

Please note that we may still use any aggregated and de-identified Personal Information that does not identify any individual and may also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Policy Context

Policy context – this policy relates to:	
Standards	NDIS Quality Standards: Provider Governance and Operational Management Australian Privacy Principles Australian Cyber Security Centre (ACSC) Essential 8 Framework NIST (US National Institute of Standards & Technology) Cybersecurity Framework Australian Government Office of the Australian Information Commissioner (OAIC) – Data Breach preparation and response
Legislation	Privacy Act 1988 (Cth) (Privacy Act) NDB Scheme in Part IIIC of the Privacy Act
Policies	POL2023_041 Privacy Policy POL2023_036 Risk Management POL2023_016 Information Security POL2023_014 Data Classification & Handling POL2023_018 Cyber Incident Response Policy POL2023_015 Endpoint Security & Detection Policy
Procedures	PRO2023_017 IT Business Continuity Plan PRO2023_018 Disaster Recovery Plan SD052_202305 Data Breach Response Plan
Forms, record keeping, other documents	Complaints and Feedback Register