



## PRIVACY POLICY

### 1. INTRODUCTION

This document sets out the privacy policy of Lalatat International Pty Ltd (ACN 642 581 468) (referred to in this privacy policy as **Lalatat**).

This privacy policy applies whenever Lalatat collects your personal information (or personal data). This includes between you, the visitor to this website (whether directly as our customer or as personnel of our customer), and Lalatat, the owner and provider of this website and also where Lalatat is directed by a third party to process your personal information. This privacy policy applies to Lalatat's use of any and all data collected by Lalatat or provided by you in relation to your use of the website and the provision of Lalatat's goods and services to you.

Lalatat takes its privacy obligations seriously and has created this privacy policy to explain how it collects and treats your personal information. Personal information is that information which is identifiable as being about you.

### 2. LAWS AND STANDARDS LALATAT COMPLY WITH

Lalatat complies with:

- (a) the Australian Privacy Principles established by the *Privacy Act 1988* (Cth); and
- (b) to the extent the European Union's *General Data Protection Regulation 2016/679* ('**GDPR**') applies to Lalatat and Lalatat's use of your information, the GDPR.

### 3. TYPES OF PERSONAL INFORMATION LALATAT COLLECTS

The personal information Lalatat collects may include the following (either yours, or your child's as applicable):

- (a) name;
- (b) mailing or street address;
- (c) email address;
- (d) social media information;
- (e) telephone number and other contact details;
- (f) workplace or school;
- (g) age;
- (h) date of birth;
- (i) sensitive information as set out below;
- (j) credit card or other payment information;
- (k) information in connection with client surveys, questionnaires and promotions;
- (l) your device identity and type, I.P. address, geo-location information, page view statistics, advertising data and standard web log information;
- (m) information about third parties; and
- (n) any other information provided by you to Lalatat via this website or Lalatat's online presence, or otherwise required by Lalatat or provided by you.

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#### 4. HOW WE COLLECT PERSONAL INFORMATION

Lalatat will endeavour to ensure that information it collects is complete, accurate, accessible and not subject to unauthorised access.

Lalatat may collect personal information either directly from you, or from third parties, including where you:

- (a) contact Lalatat through its website;
- (b) register for an account for the provision of or receive goods and services from Lalatat;
- (c) communicate with Lalatat via email, telephone, SMS, social applications (such as LinkedIn, Facebook or Twitter) or otherwise;
- (d) interact with Lalatat's website, social applications, services, content and advertising; and
- (e) use Lalatat's automated referral system or manual referral service.

Lalatat may also collect personal information from you when you use or access Lalatat's website or Lalatat's social media pages. This may be done through use of web analytics tools, 'cookies' or other similar tracking technologies that allow Lalatat to track and analyse your website usage. Cookies are small files that store information on your computer, mobile phone or other device and enable and allow the creator of the cookie to identify when you visit different websites. Cookies may be used to serve relevant ads to website visitors through third party services such as Google Adwords. These ads may appear on this website or other websites you visit. If you do not wish information to be stored as a cookie, you can disable cookies in your web browser.

Lalatat may use Google Analytics to collect and process data, including when you use third party websites or apps. To find out more see [How Google uses data when you use our partners' sites or apps](#).

If you are providing personal information of a child you must be that child's parent or guardian and you must provide consent for your child's personal information to be collected.

#### 5. USE OF YOUR PERSONAL INFORMATION

Lalatat collects and uses personal information for the following purposes:

- (a) to provide goods, services or information to you;
- (b) for record keeping and administrative purposes;
- (c) to provide information about you to Lalatat's officers, employees, contractors, consultants, agents or other third parties for the purpose of providing goods or services to you;
- (d) to improve and optimise Lalatat's service offering and customer experience;
- (e) to comply with Lalatat's legal obligations, resolve disputes or enforce Lalatat's agreements with third parties;
- (f) to send you marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing (in accordance with the *Spam Act 2003* (Cth)). In this regard, Lalatat may use email, SMS, social media or mail to send you direct marketing communications. You can opt out of receiving marketing materials from us by using the opt-out facility provided (e.g. an unsubscribe link);
- (g) to send you administrative messages, reminders, notices, updates, security alerts, and other information requested by you; and
- (h) to consider an application of employment from you.

This clause applies to personal information, other than in the European Economic Area. Lalatat may disclose your personal information to cloud-providers, contractors and other third parties located inside or outside of Australia. If Lalatat does so, Lalatat will take reasonable steps to ensure that any overseas recipient deals with such personal information in a manner consistent with how it is dealt with by Lalatat.

Where you are a resident of the European Union and the GDPR applies, please see below (clause 11).

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Lalatat has endeavoured to ensure that its use and collection of your data is clear and as transparent as possible, but in the interests of keeping this policy concise it's not possible to list every circumstance in which Lalatat will use your data.

Lalatat may use third party service providers for disaster recovery services. To the extent necessary to receive those disaster recovery services, Lalatat will provide your data to that third party service provider.

Lalatat may also use third party service providers to audit the infrastructure and applications Lalatat use to store your data. To the extent necessary to receive those audit services, Lalatat will provide your data to that third party service provider.

## **6. SENSITIVE INFORMATION**

Lalatat may collect sensitive information about you or your child, during the course of providing you goods or services. The type of sensitive information Lalatat may collect includes information relating to your child's education generally, current and historical academic performance and details of your child's education provider.

Lalatat will only collect this sensitive information where you consent, and/or consent on behalf of your child, and provide Lalatat with this information. If you consent, your sensitive information may only be used and disclosed for purposes relating to providing you with Lalatat's goods and services.

Your, or your child's, sensitive information may also be used or disclosed to comply with Lalatat's legal obligations.

## **7. SECURITY**

Lalatat take reasonable steps to ensure your personal information is secure and protected from misuse or unauthorised access. Lalatat's information technology systems are password protected, and Lalatat uses a range of administrative and technical measures to protect these systems. However, Lalatat cannot guarantee the security of your personal information.

## **8. LINKS**

Lalatat's website may contain links to other websites. Those links are provided for convenience and may not remain current or be maintained. Lalatat are not responsible for the privacy practices of those linked websites and Lalatat suggest you review the privacy policies of those websites before using them.

## **9. REQUESTING ACCESS OR CORRECTING YOUR PERSONAL INFORMATION**

If you wish to request access to the personal information Lalatat hold about you, please contact Lalatat using the contact details set out below including your name and contact details. Lalatat may need to verify your identity before providing you with your personal information. In some cases, Lalatat may be unable to provide you with access to all your personal information and where this occurs, Lalatat will explain why. Lalatat will deal with all requests for access to personal information within a reasonable timeframe.

Where you are a resident of the European Union and the GDPR applies to your personal information, you have the right to ask for 'subject access request' or 'SAR' being a copy of your personal data held by Lalatat. Where Lalatat do hold such data about you Lalatat will provide you with a copy of the data Lalatat hold about you. This will be in a commonly used machine-readable file where you request Lalatat to e-mail the information to you. Lalatat will also give you a description of the data, tell you why Lalatat are holding it and tell you who Lalatat could have disclosed it to.

If you think that any personal information Lalatat hold about you is inaccurate, please contact Lalatat using the contact details set out below and Lalatat will take reasonable steps to ensure that it is corrected. Lalatat will also stop processing data on your request and you may also request that Lalatat delete the data held about you.

If you would like a copy of the information which Lalatat hold about you or believe that any information Lalatat hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email Lalatat using the contact details set out in the 'Contact Us' section below.

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Lalatat reserves the right to refuse to provide you with information that Lalatat hold about you, in certain circumstances set out in the *Privacy Act 1988* (Cth).

#### **10. CHANGE OF CONTROL**

If there is a change of control in Lalatat's business or a sale or transfer of business assets, Lalatat reserves the right to transfer to the extent permissible at law Lalatat's user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. Lalatat would seek to only disclose information in good faith and where required by any of the above circumstances.

#### **11. TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA ('EEA')**

If you are an EU resident and the GDPR applies, Lalatat will wherever possible, ensure your data remains in the EEA.

Information that Lalatat collect in the EEA may from time to time be stored, processed in or transferred between parties located in countries outside of the EEA which may not have as stringent data protection laws as found in the EEA.

Some of Lalatat's third party service providers may be also located outside the EEA. If Lalatat transfer your data outside the EEA in this way (where you are a resident of the European Union and the GDPR applies to your personal information) Lalatat will ensure that the third party provider Lalatat uses is compliant with the GDPR and that your privacy continues to be protected as outlined in this privacy policy.

If Article 27 of the GDPR applies to Lalatat, Lalatat will appoint a representative within the European Union in accordance with the GDPR. Please contact Lalatat and Lalatat will let you know the representative's contact details.

#### **12. COMPLAINTS**

If you wish to complain about how Lalatat handle your personal information or information held by Lalatat, please contact Lalatat using the details set out below including your name and contact details. Lalatat will investigate your complaint promptly and respond to you within a reasonable time.

For data which is subject to the GDPR, you have the right to lodge a complaint with the local regulator in your jurisdiction in Europe if you do not feel Lalatat have adequately upheld your rights under GDPR.

#### **13. CONTACT US**

For further information about Lalatat's privacy policy or practices, or to access or correct your personal information, or make a complaint, please contact Lalatat using the details set out below:

**Email: [info@lalatat.com](mailto:info@lalatat.com)**

By providing personal information to Lalatat, you consent to Lalatat's storage, maintenance, use and disclosing of personal information in accordance with this privacy policy.

Lalatat may change this privacy policy from time to time by posting an updated copy on its website and Lalatat encourage you to check its website regularly to ensure that you are aware of Lalatat's most current privacy policy.