

Privacy Policy

1. About this Privacy Policy

2. Sober in the Country Ltd. (ACN 636 739 645) (**SITC, we, us or our**) is committed to protecting your privacy, as required by the *Privacy Act 1988 (Cth)* (**Privacy Act**) and the Australian Privacy Principles (**APPs**) in relation to the management of personal Information. This Privacy Policy describes our policies and procedures on the collection, holding, use and disclosure of your Personal Information as required. It should be read together with the Terms of Use for our Website at <https://www.soberinthecountry.org/termsandconditions>.

3. What is Personal Information?

- 3.1 "**Personal Information**" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

4. What Personal Information do we collect and hold?

- 4.1 The types of Personal Information we may collect about an individual will depend upon the nature of our interaction with them. Personal Information we collect may include (but is not limited to) the following:

- (a) name;
- (b) address;
- (c) age and/or date of birth;
- (d) telephone number;
- (e) social circumstances;
- (f) email address;
- (g) communication preferences;
- (h) professional learning;
- (i) your preferences for receiving further information about our programs, campaigns or activities;
- (j) title, department name, company information or marketing spend;
- (k) demographic information and unique identifiers in order to provide you with a more personalised experience or to verify your passwords;
- (l) personal stories you share with us and in on our platforms such as in our private Facebook groups; and
- (m) any other information you wish to share with us in connection to your journey and path to using our services.

- 4.2 There may be circumstances where you provide us with sensitive information about you, for example, information about your health. You may provide this inadvertently by telling us about the current status of your journey. In circumstances where we want to use and/or disclose such information, we will seek your consent.

- 4.3 If you order certain resources, or make a donation to us, we may also require you to provide your credit card or bank details and other information, which will allow us to process your payment request and facilitate the transaction.

- 4.4 The choice of how much information you provide to us is yours, but if you want to register as a member of, or have a user account on our websites, order printed or download digital resources, make a purchase and/or donation, contact us via email,

or otherwise participate in services, programs and/or events, we require certain information from you in order to provide those services.

- 4.5 Where possible, you have the option of interacting with us anonymously (for example, as a visitor of the website) or using a pseudonym if you feel more comfortable dealing with us that way. For example, if you contact us by telephone with a general question, we will not ask for your full name unless we need it to answer your question.

5. How does SITC collect your Personal Information?

- 5.1 We collect your Personal Information to allow us to conduct our organisational functions to provide, market and sell our products and services and for the specified purposes set out in paragraph 6. In some circumstances, the collection of Personal Information may be required by law.

- 5.2 SITC may collect your Personal Information in certain circumstances, including if you:

- (a) deal with us directly over the phone or via our support service;
- (b) have contact with us in person;
- (c) participate in public or closed surveys, questionnaires or conference events;
- (d) register for face-to-face or digital events (such as webinars); and
- (e) interact with us online, including through our websites, email, webchats, mobile applications and social media channels (such as Facebook, Twitter, YouTube, Instagram or LinkedIn – these social media channels will also handle your Personal Information for their own purposes and have their own privacy policies).

- (f)
- 5.3 We may also collect your Personal Information from publicly available sources such as your social media posts.

- 5.4 Wherever possible, we will try to collect Personal Information from you directly, rather than from third parties and other sources, unless it is unreasonable or impractical to collect this information directly from you, or if we are otherwise permitted to do so.

- 5.5 Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

- 5.6 If the Personal Information we collect includes sensitive information, including health information, we will ask for your consent to collect sensitive information and will only disclose this information for the purposes for which you gave it to us or for a directly related purpose you would reasonably expect.

6. Information collected via our Website

- 6.1 Personal Information may be collected by us and by our third-party service providers who assist us in operating our website at www.soberinthecountry.org (the **Website**).

- 6.2 We may use various technological methods from time to time to track the visiting patterns of individuals accessing our Website, including but not limited to the methods set out in paragraph 5.

Cookies

6.3 In some cases, we may also collect your Personal Information through the use of “cookies”. When you access one of our websites, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer or internet enabled device. This allows us to recognise your computer or internet-enabled device, and whether you have already registered and greet you each time you visit our website/s. It also enables us to keep track of services you view so that, if you consent, we can send you news about those services. We also use cookies to measure traffic and engagement patterns, to determine which areas of our website have been visited and to measure overall, aggregate transaction patterns. We use this to research our website visitor’s habits and what they are looking for and accessing, so that we can continually improve our services, programs, content and resources. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. .

Google Analytics

6.4 Our websites may use Google Analytics, a service that transmits website traffic data to Google servers in the United States. Our websites and mobile applications may also use the following Google Analytics Advertising Features:

- Remarketing and Impression Reporting;
- Demographics and Interest Reporting.; and
- Government (Commonwealth, State, Territory and Department) reporting.

6.5 Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and web page usage in order to improve our services, programs, content and resources.

6.6 By using our Website, you consent to the processing of data about you by Google in the manner described in Google’s privacy policy and for the purposes set out above. If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

Click Stream Data

6.7 When you read, browse or download information from our Website, we or our internet service provider may also collect information such as the date, time and duration of a visit, the pages accessed, the IP address of your computer, and any information downloaded. This information may be used for purposes including statistical, reporting and website administration, maintenance and improvement purposes.

6.8 We may also use Site Improve to identify audience habits and behaviours so that content and User Experience-related issues can be resolved, enhancing the overall website experience for users.

Third Party Content (e.g. social media links)

6.9 Some of the content on our Website may include applications made available by third parties, such as social media buttons or links that allow you to share content or links to our Website through the relevant third-party platforms. These third-party

applications themselves may facilitate the collection of information by those third parties through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third-party websites to understand their privacy practices and options they may make available to you in relation to their collection of your Personal Information.

7. How do we use your Personal Information?

7.1 We use the Personal Information we collect about you for SITC's organisational functions and activities in order to operate our organisation efficiently and to market our products and services.

7.2 We may collect, hold and use your Personal Information:

- (a) to allow you to obtain access to the interactive elements of our Website (including the online forums, our campaign websites and other voluntary services);
- (b) to provide you with the information, resources or merchandise you have requested;
- (c) to involve you in programs, campaigns, research, activities or other initiatives undertaken by SITC;
- (d) to moderate and control any of our social media platforms in particular our private Facebook Groups;
- (e) to enable us to share your stories via our social media platforms (with your consent);
- (f) to allow you to make a donation;
- (g) to allow you to join our Website as a registered user;
- (h) to allow you to register as a SITC user or volunteer;
- (i) to allow you to apply to hold a fundraising event;
- (j) for the marketing and research purposes of SITC, its contractors or service providers;
- (k) for internal administrative purposes;
- (l) to respond to 'Contact Us' enquiries, general website feedback or assistance, or media enquiries;
- (m) to update our records and keep your contact details up to date;
- (n) for research, advice and information, including for bench-marking purposes;
- (o) to send you emails about our programs, campaigns or activities if you have agreed to receive our emails (you will be provided with an opportunity in each email to decline to receive any further emails from us by unsubscribing – if you are a registered member of our websites, you can also edit your communication preferences via your member account);
- (p) in the case of marketing automation, to improve the emails that are sent to you and to improve the personalisation, services, programs, content and resources that are offered to you;
- (q) to enable like-minded organisations to contact you with information that may be of interest to you (if you have consented to this);
- (r) to assess any application from you to work with us; and
- (s) if you lodge a complaint or query with us, to process and respond to your complaint or query.

7.3 We may also use any Personal Information that you provide via our Social Media platforms, including (but not limited to) our Bush Tribe Facebook Group. In these instances, we will use and handle such Personal Information in accordance with our

Terms and Conditions available here (www.soberinthecountry.org/termsandconditions), this Privacy Policy and any collection statements we provide to you (for Facebook Groups these will be made available to you via that platform).

- 7.4 We may aggregate Personal Information for reporting, statistical and analysis purposes and for business, product and service improvement purposes. This allows us to inform ourselves better and anticipate our customers' preferences and requirements, to assess and report on the effectiveness of our funding to key stakeholders, and to monitor and improve the effectiveness of our business, products and services. We may also de-identify information for inclusion in such aggregated databases or reports.
- 7.5 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law. Still, we do not promise to monitor the use of the Website or our social media platforms or to retain the content of any user session.
- 7.6 You consent to us using your Personal Information in the above ways and as set out in this Privacy Policy.
- 7.7 We may otherwise collect, use or disclose your Personal Information where the collection, use or disclosure is:
- (a) in accordance with this Privacy Policy or any agreement you enter into with us; or
 - (b) required or authorised by law, including without limitation the APPs under the Privacy Act.
- 7.8 If you access the interactive elements of our websites only your display name will be shown online. We recommend that you do not post information online that may identify you or anyone else such as your address, email address or phone number. If you do post Personal Information online, your Personal Information may be identified, recovered and displayed by internet search engines outside of your and our control.

8. When do we disclose your Personal Information

- 8.1 SITC may disclose, or provide access to, your Personal Information to third parties in accordance with this Privacy Policy and in connection with the purposes described in paragraph 6. Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to our related entities, to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).
- 8.2 We may also disclose your Personal Information to:
- (a) any of SITC's internal divisions, business units or departments;
 - (b) our service providers that host our website servers;
 - (c) third parties that assist us in operating our social media platforms such as our private Facebook Groups;
 - (c) your nominated representatives;
 - (d) other organisations who assist us in providing products and services to you;
 - (e) professional service providers and advisors who perform functions on our behalf, such as accountants, auditors and lawyers;

- (f) representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing goods or services or administering our business (such as for data storage or processing, printing, mailing, marketing, planning and product or service development); and/or
- (g) Government, regulatory authorities and other organisations as required or authorised by law.

8.3 We may also disclose your Personal Information to our Website host in certain limited circumstances, for example, when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.

8.4 We may also disclose your Personal Information if:

- (a) you have consented to the disclosure;
- (b) where disclosure is necessary to prevent injury to life or health; or
- (c) it is required or authorised by or under an Australian law or a court/tribunal order.

9. Interstate and overseas disclosures

9.1 Some of your Personal Information may be disclosed, transferred, stored, processed or used overseas by us or by third-party service providers. This may happen if:

- (a) our offices or related entities are overseas;
- (h) we outsource certain activities overseas;
- (i) transactions, information, services or products have an overseas connection; or
- (j) our computer systems, including IT servers, are located overseas.

9.2 You consent to the collection, use, storage and processing of your Personal Information outside of Australia as set out in this Privacy Policy.

9.3 In particular, your Personal Information may be disclosed to third parties **in the US**, and such other countries in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy. Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you might not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your Personal Information.

10. Other uses and disclosures

10.1 We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Policy. If we do so, we will generally take reasonable steps to make it known to you at the time we collect or use your Personal Information.

11. Marketing

- 11.1 You consent to us using your Personal Information for sending you information, including promotional material and surveys about us or our products and services, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, SMS and MMS messages.
- 11.2 If you do not want to receive marketing information from us, you can unsubscribe in any of the following ways:
- (a) clicking on the 'Unsubscribe' or subscription preferences link in a direct marketing email that you have received from us; or
 - (k) contacting us using the contact details specified in paragraph 15.

12. Storage and security of your Personal Information

- 12.1 We take reasonable steps to ensure the security of all information we collect, including that the information is protected from misuse and loss and from unauthorised access, modification or disclosure. However, no data transmission over the internet or information stored on servers accessible through the internet can be guaranteed to be fully secure. In addition, we take reasonable steps to destroy or de-identify your Personal Information once we no longer need it or have been directly instructed by you to permanently remove or suppress your Personal Information.
- 12.2 In the event of any unauthorised access or unauthorised disclosure or loss of your Personal Information that is likely to result in serious harm to you, we will investigate and we may use your Personal Information to notify you and the Office of the Australian Information Commissioner in accordance with the Privacy Act.

13. Accessing and correcting your Personal Information

- 13.1 If you wish to access or correct any Personal Information we may hold about you, please contact SITC using the contact details specified in paragraph 14.
- 13.2 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and properly update the information provided to us to keep it true, accurate, current and complete.
- 13.3 Please contact us in any of the ways specified in paragraph 14 if you believe that the Personal Information is inaccurate, incomplete or out of date, and we will use all reasonable efforts to correct the information.
- 13.4 It would assist us to ensure we properly understand your request and allow us to respond more promptly if requests are made in writing and include as much detail as possible.

14. How do we deal with complaints about privacy?

- 14.1 If you believe your privacy has been breached or you have a complaint about how we have handled your Personal Information, please contact us.
- 14.2 It would assist us to respond to your complaint promptly if it is made in writing.
- 14.3 We will notify you of the outcome of our investigation.

14.4 If you are not satisfied with our response, then you may lodge a formal complaint with the Office of the Australian Information Commissioner (for more information, please see www.oaic.gov.au).

15. What to do if you have a question, problem or complaint, or want to contact us about our use of your Personal Information or this Privacy Policy

15.1 If you have an queries, comments, concerns or complaints about our Privacy Policy, please contact our Privacy Officer in any of the following ways:

- (a) Email Address: [insert]
- (l) Post: [insert]
- (m) Phone: [insert]

16. Changes to this Privacy Policy

This Privacy Policy may change from time to time. Any updated versions of this Privacy Policy will be posted on our websites and will be effective from the date of posting.

This Policy was last updated in October 2023. Meanings All words retain their usual meanings. References to "Sober in the Country", "SITC" "we", "us" and "our" are references to Sober in the Country, ACN 636 739 645.