

# Kumo Study Privacy Policy 2025

This Privacy Policy sets out how Kumo Study Pty Ltd manages the personal information we collect and hold. Kumo Study takes privacy seriously and will only collect, use and disclose personal and sensitive information in accordance with the Privacy Act 1988 (Cth) ("Privacy Act") and other applicable laws.

From time to time, we may review and update this Privacy Policy to take account of new laws and technology, changes to operations and practices, and to ensure it remains appropriate.

## What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect includes names, addresses, email addresses, phone numbers and other contact details, dates of birth.

This Personal Information is obtained in many ways including interviews, correspondence by telephone, email, via our website, from your website, from media and publications, from other publicly available sources and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, satisfying our legal obligations, performing associated administrative activities and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use of disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

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.

## Compliance and Responsibilities

The Company respects the privacy of all its Representatives, members and stakeholders. Personal data must be handled responsibly and in compliance with the privacy principles of the Privacy Act 1988 (Cth) and other applicable laws.

Representatives who handle the personal data of others must:

- Act in accordance with applicable law;
- Act in accordance with any relevant contractual obligations;
- Collect, use and process such information only for legitimate business purposes;
- Limit access to the information to those who have a legitimate business purpose for seeing the information; and

- Take care to prevent unauthorised disclosure

## **Policy Statement**

### **Third Parties**

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Cookies may be collected by some third party web services we use as a part of the Kumo Study processes. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings.

Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your settings for cookies. If you turn cookies off, some features may be disabled and some of the features that make your site experience more efficient may not function properly.

### **Disclosure of Personal Information**

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use of disclosure;
- People providing education and support services including our partners; and
- Where required or authorised by law

### **Security of Personal Information**

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in our digital files, which will be kept by us for a minimum of 5 years.

### **Storage of Personal Information**

Kumo Study Pty Ltd may use third party online or cloud service providers to store Personal Information and to provide services that involve the use of Personal Information, such as services relating to email, instant messaging, education, research, financial reporting and payment processing.

Some limited Personal Information may also be provided to these service providers to enable them to authenticate users to access their services. This Personal Information may be stored in the cloud, which means that it may reside on service provider's servers, which may be situated outside Australia.

We make reasonable efforts to be satisfied about the protection and security of any Personal Information processed and stored outside Australia.

## **Access to your Personal Information**

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing at [hello@kumostudy.com](mailto:hello@kumostudy.com)

Kumo Study Pty Ltd may charge an administrative fee for providing a copy of your Personal Information to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material request. If the information sought is extensive, you will be advised of the likely cost in advance.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

## **Maintaining the Quality of your Personal Information**

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

## **Data Breaches**

A data breach occurs when personal information is lost or subjected to unauthorised access, use, modification or disclosure or other misuse or interference.

We have implemented a data breach response plan to assist us to effectively contain, evaluate and respond to data breaches in order to mitigate potential harm to any persons affected by a data breach. In summary, our data breach response plan:

- Directs our staff as to the steps they should take in the event of an actual or suspected data breach;
- Appoints a team to handle data breaches;
- Specifies a strategy for assessing and responding to data breaches;
- Sets out the process for notifying any affected persons, the Privacy Commissioner, and other relevant parties; and
- Outlines the review process to help prevent data breaches in the future.

We will generally notify you if we reasonably believe that your personal information has been subjected to a data breach if:

- There is a risk of serious harm to you;
- Notification could enable you to avoid or mitigate serious harm;
- The compromised personal information is sensitive or likely to cause humiliation or embarrassment to you; or
- We are required to notify you by law.

We will also notify the Privacy Commissioner if we reasonably believe that your personal information has been subjected to a data breach that is likely to result in serious harm to you. Where appropriate, we may also notify other third parties of a data breach.

## **Policy Updates**

This Policy may change from time to time and is available on our website.

## **Privacy Policy Complaints and Enquiries**

If you have any queries or complaints about our Privacy Policy, please contact us at: [hello@kumostudy.com](mailto:hello@kumostudy.com)

## **Definitions**

### **Sensitive information**

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

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent: or where required or authorised by law.

## **Legislation by Jurisdiction**

Federal: The Privacy Act 1988 (Cth)

New South Wales: Privacy and Personal Information Protection Act 1998 (PPIP Act)

Australian Capital Territory: Information Privacy Act 2014 (ACT)

Victoria: Privacy and Data Protection Act 2014 (Vic)

Tasmania: Personal Information and Protection Act 2004 (Tas)

Western Australia: Freedom of Information Act 1992 (WA)

Northern Territory: Information Act 2002 (NT)

South Australia: Premier and Cabinet Circular PC 012 – INFORMATION PRIVACY PRINCIPLES  
(IPPS) INSTRUCTION