Outcomes Star (TRIANGLE CONSULTING SOCIAL ENTERPRISE LTD)

PRIVACY POLICY FOR AUSTRALIA AND NEW ZEALAND

Triangle Consulting Social Enterprise Ltd, trading as Outcomes Star (Company registration number 07039452) (**we**, **us** or **our**), understands that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or collected by us, when interacting with you.

This Privacy Policy takes into account the requirements of the *Privacy Act 1988* (Cth) and the Australian Privacy Principles, as well as the New Zealand Privacy Act 2020 and the Information Privacy Principles.

This Privacy Policy was last updated December 2025.

Information we process

We process information belonging to the following audience types:

Audience		Description
A.	**Marketing contact information**	Individuals who have opted-in to communication about Outcomes Star from our partners, Unique Outcomes.
B.	**Customer information**	Personnel from client organisations involved in the purchase of products and services from our partners, Unique Outcomes.
C.	**Licensed Trainer information**	Personnel from client organisations who have completed Licensed Trainer training from Unique Outcomes and who have a Licensed Trainer licence
D.	**Account Lead information**	Personnel from client organisations who have administrator permissions within Outcomes Star Online
E.	**Practitioner information**	Personnel from client organisations who have practitioner or service manager permissions within Outcomes Star Online and who may have completed training from our partners, Unique Outcomes

F.	**Service User information**	People being supported by the client organisation, whose data is collected by the client organisation using the Outcomes Star and processed by the Outcomes Star Online (optional)

A reference to **you** in this Privacy Policy, means one or all of the audience types identified above, as applicable.

The information we collect

Personal information: is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The types of personal information we may collect about you include:

- **Identity Data** including your name, age and profession.
- **Contact Data** including your telephone number, address and email.
- **Financial Data** including bank account and payment card details.
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** when you access any of our websites or platforms, details about your internet protocol (IP) address, login data, browser session and geo-location data, statistics on page views and sessions, device and network information, acquisition sources, search queries and/or browsing behaviour, access and use of our website (including through the use of Internet cookies), and communications with our website.
- **Interaction Data** including information you provide to us when you participate in any interactive features, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.
- **Sensitive** information is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric

information. We do not actively request sensitive information about you but we may process it if it's provided to us. If at any time we need to collect sensitive information about you, unless otherwise permitted by law, we will first obtain your consent and we will only use it as required or authorised by law. If you are providing sensitive information to us on behalf of another person (for example as a Service User as identified in the audience type above), it is your responsibility to ensure that you have validly obtained the consent of the individual and have a right to share it with us.

How we collect personal information

We collect personal information in a variety of ways, including:

- From our partners, Unique Outcomes;
- when you provide it directly to us, including face-to-face, over the phone, over email, or online;
- when you complete a form, such as registering for any events or newsletters, or responding to surveys;
- when you use any website we operate (including from any analytics and cookie providers or marketing providers. See the "Cookies" section below for more detail on the use of cookies);
- from third parties;
- from publicly available sources; or
- when you provide to us on behalf of another individual.

Why we collect, hold, use and disclose personal information

We have set out below, in a table format, a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

Purpose of use / disclosure	Type of Personal Information
To fulfill the terms of licence agreements with our clients provided by Unique Outcomes, including to support your clients or customers.	• Identity Data • Contact Data
To contact and communicate with you about our business, including in response to any support requests you lodge with us or other enquiries you make with us.	• Identity Data • Contact Data
To contact and communicate with you about any enquiries you make with us via any website we operate.	• Identity Data • Contact Data

For internal record keeping, administrative, invoicing and billing purposes.	• Identity Data • Contact Data • Financial Data • Transaction Data
For analytics, market research and business development, including to operate and improve our business, associated applications and associated social media platforms.	• Technical and Usage Data
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	• Identity Data • Contact Data • Technical and Usage Data • Marketing and Communications Data
To run promotions, competitions and/or offer additional benefits to you.	• Identity Data • Contact Data • Interaction Data • Marketing and Communications Data
If you have applied for employment with us, to consider your employment application.	• Identity Data • Contact Data • Professional Data
To comply with our legal obligations or if otherwise required or authorised by law.	• Any relevant Personal Information

Our disclosures of personal information to third parties

Personal information: We may disclose personal information to:

- our employees, contractors, partner in Australia and Aotearoa NZ, Unique Outcomes, and/or related entities;
- IT service providers, data storage, web-hosting and server providers;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators or processors;
- if we merge with, or are acquired by, another company, or sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser's advisers and may be among the assets transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as analytics providers and cookies; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Overseas disclosure

Australian Residents

We store personal information overseas, in the United Kingdom and within the European Union. We will only disclose your personal information overseas in accordance with the Australian Privacy Principles.

New Zealand Residents

We store personal information outside of New Zealand, in the United Kingdom and within the European Union. Before disclosing any personal information to an overseas recipient, we will comply with Information Privacy Principle 12 and only disclose the information if:

- you have authorised the disclosure after we expressly informed you that the overseas recipient may not be required to protect the personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act 2020;
- we believe the overseas recipient is subject to the Privacy Act 2020;

- we believe that the overseas recipient is subject to privacy laws that, overall, provide comparable safeguards to those in the Privacy Act 2020;

- we believe that the overseas recipient is a participant in a prescribed binding scheme;

- we believe that the overseas recipient is subject to privacy laws in a prescribed country; or

- we otherwise believe that the overseas recipient is required to protect your personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act 2020 (for example pursuant to a data transfer agreement entered into between us and the overseas recipient).

Your rights and controlling your personal information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to do business with you.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our

investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (if you are an Australian resident), or the Office of the New Zealand Privacy Commissioner (if you are a New Zealand resident).

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Purpose
Currency	This cookie stores the currency used for the website (AUD)
Language	This cookie stores the language used for the website (English)
PHPSESSIONID	This cookie contains a unique ID to support functions (for example last viewed products) to improve user experience

_ga / _gid / _gat	These cookies are used by our Google Analytics account to track customer traffic through the website to help us understand how our website is being used by our customers

Use of personal information

We limit our use of the personal information that we process to providing or improving our business. We do not use the personal information for any other purposes.

We only transfer the personal information to others if it is necessary to provide or improve our business or as necessary to comply with applicable law or as part of a merger, acquisition or sale of assets where we notify you of this.

We do not use or transfer the personal information for serving ads, including retargeting, personalised or interest based advertising.

We don't allow humans to read the personal information unless

- we have first received your consent to view specific messages, files or other data;
- it is necessary for security purposes (such as investigating a bug or abuse);
- our use is limited to internal operations and the personal information (including derivations) have been aggregated and anonymised.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact our Privacy Officer at:

Triangle Consulting Social Enterprise Ltd (Company registration number 07039452)

Email: Compliance@outcomesstar.org