

ESHER HOUSE PRIVACY STATEMENT

Privacy & Data Protection Policy

Esher House Pty Ltd (Esher House, ABN: 76 145 906 654) collects and handles personal information in accordance with the Privacy Act 1988 (Cth), including the Australian Privacy Principles.

This statement sets out how the information collected on www.psychass.com (or clients' own-branded stage of change websites set-up by Esher House) will be collected, stored, used and disclosed. The information provided by which individuals can be identified, will only be used in accordance for its intended purpose in accordance with this statement. In particular, clients' customer data (e.g. jobseekers for employment service providers, students for online course providers, applicants for loan companies, apprentices/school-leavers for courses etc.) will be protected as far as is practicable from becoming publically available or utilised for marketing purposes.

WHAT INFORMATION WILL BE COLLECTED AND HOW?

The following information about individuals may be collected via www.psychass.com and stored in the highly secure AWS servers in each relevant continent/country:

- name;
- address;
- date of birth/age;
- employment status;
- ethnicity;
- job title;
- ethnic origin;
- disability status;
- general location;
- immigration status details i.e. passport/visa number and expiry dates;
- tax file number, case number, jobseeker ID etc.;
- employment status;
- anything else deemed relevant to each behavioural change project.

This information will generally be collected from individuals when they enter the information on Psychass.com/the client's own stage of change website. Alternatively, Esher House may enter information provided by its client on Psychass.com on their behalf. As a rule, Esher House will collect the minimum appropriate data for each individual and will avoid sourcing contact details etc. Additionally Esher House will only undertake projects that are ethically "sound" and that will likely benefit the individual involved and improve their lives in some manner.

SENSITIVE INFORMATION

The information collected from a client may include sensitive information (including information relating to an employee's health). This privacy statement will be readily available on Esher House managed survey websites to ensure that the individual is happy with the collection, storage, use and disclosure of their personal information in accordance with this statement, whether that information is collected from the individual or the client. Again, we reiterate that the minimum volume of personal data will be collected and it will not be made available to third parties for marketing purposes.

WHAT IS THE INFORMATION USED FOR?

Information is collected and stored on behalf of the client. Esher House will collect, store, use and disclose the information to the client, and will use overall data to inform and construct general trend data for reports and possibly academic papers. Esher House staff will also use the individual's information to advise and inform clients in relation to different and more relevant support methodologies that are more engaging and support individuals more than existing practices. Personal information will only be used for purposes related (and in the case of sensitive information, purposes directly related) to the support programme, as otherwise required by law, or for another purpose to which the individual consents.

Esher House may use de-identified information to compile statistical data in relation to trends. This data will be completely anonymous.

RETENTION OF RECORDS

Esher House will take all reasonable steps to destroy personal information if it is no longer required. If a client terminates their agreement in relation to Psychass.com, client information will be retained for a period of 60 months after their contract ends before being deleted.

SECURITY

Esher House will take reasonable steps to ensure that information is kept secure at all times and to protect the information against unauthorised access, modification or disclosure and from misuse, interference and loss.

The data stored on Psychass.com is kept securely on the nearest AWS server to the clients' activity (ie. Australia, West Coast USA, Ireland). Alternatively, where a client demands it, the data will be stored on their own servers where their own Privacy and Data Protection policy takes precedence.

Client access to Psychass.com will only be via a secure username and password. The username and password for each individual is unique and only allows access to that client's data. Only certain authorised staff of the client or Esher House, who are required to have access to personal information for the purposes of their job role, will be authorised and will have the necessary access rights to do so. All users of Psychass.com are encouraged to keep their unique user and password strictly confidential. Users of Psychass.com and client's websites set-up by Esher House must notify us if they become aware of any unauthorised access.

Although the security of data is very important to Esher House, no data transmission over the internet is 100% secure. Esher House cannot accept responsibility for the security of information sent or received over the internet.

See Appendix I – Robustness & Security of Amazon Web Service Servers.

ACCESS AND AMENDMENT REQUESTS

Any employee may request access to their personal information held on Psychass.com by making a request in writing to Esher House. A reasonable fee may apply for the provision of this information (ordinarily, an electronic print-out or photocopy) and the employee will be asked to provide two forms of identification for security.

Esher House will take reasonable steps to make sure that any personal information it collects, uses or discloses is accurate, complete and up-to-date. If an individual or client believes that any information derived from Psychass.com is inaccurate, incomplete, out of date, irrelevant or misleading, they should notify us (using the contact details below) as soon as possible so we can directly address the matter.

Esher House Pty Ltd
c/o 8 Innovation Parkway
Birtinya
Queensland 4575

ABN 76 145 906 654
217 Prince Edward Park Rd
Woronora
New South Wales 2232

ACN 145 906 654
c/o Exemplar Human Services
170 Village Blvd Apt 23, Incline
Village, Nevada 89451

info@esherhouse.org
1 Rochford Avenue
Leigh-on-Sea
Essex SS0 7DT

Requests for access and amendments will be responded to within a reasonable period in accordance with Australian Privacy Principles 12 and 13. The individual or client will be notified that such a request has been received. Esher House may refuse the request for access or amendment to personal information in the circumstances outlined in the Australian Privacy Principles. If access is refused, Esher House will provide a written reason for the refusal.

COMPLAINTS

If you believe that there has been a breach of the Australian Privacy Principles you should make a complaint in writing to Esher House. Esher House will respond to the complaint and confirm if further information or evidence is required. Esher House will then investigate the issue and advise you in writing of the outcome of the investigation and any steps taken to resolve your complaint. If you are not satisfied with the outcome, Esher House will advise you of further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

DISCLOSURE

No personal information held on psychass.com/AWS will be passed to third parties by Esher House, without the consent of the individual concerned, unless such disclosure is to a government body, regulator, law enforcement agency or other party required or authorised by Australian law.

Esher House will not disclose any personal information to overseas recipients. The privacy statement will be made available to anyone who requests it, whether at Esher House's offices or on its website. Please review the website regularly as this statement may change from time to time.

INFORMATION

If you would like further information or have any queries, please feel free to contact Esher House:

Email: info@esherhouse.org

Signed:



Darren Coppin
Chief Executive
Esher House Pty Ltd

APPENDIX I - ROBUSTNESS & SECURITY OF AMAZON WEB SERVICE SERVERS

About Amazon Web Services:

Launched in 2006, Amazon Web Services offers a robust, fully featured technology infrastructure platform in the cloud comprised of a broad set of compute, storage, database, analytics, application, and deployment services from data center locations in the U.S., Australia, Brazil, China, Germany, Ireland, Japan, and Singapore. More than a million customers, including fast-growing startups, large enterprises, and government agencies across 190 countries, rely on AWS services to innovate quickly, lower IT costs and scale applications globally. To learn more about AWS, visit <http://aws.amazon.com>.

The AWS cloud infrastructure is housed in AWS's data centers, designed to satisfy the requirements of our most security-sensitive customers. The AWS infrastructure has been designed to provide the highest availability while putting strong safeguards in place regarding customer privacy and segregation. When deploying systems in the AWS Cloud, AWS helps by sharing the security responsibilities with you. AWS manages the underlying infrastructure, and you can secure anything you deploy in AWS.

AWS Cloud infrastructure meets the requirements of an extensive list of global security standards, including: ISO 27001, SOC, the PCI Data Security Standard, FedRAMP, the Australian Signals Directorate (ASD) Information Security Manual, and the Singapore Multi-Tier Cloud Security Standard (MTCS SS 584).

Regions:

- Services over a million active customer in more than 190 countries
 - Therefore can meet customers needs on a global basis
 - Expanding their global infrastructure so data can reside in region customer specifies
 - Regions are:
 - o North America
 - o South America
 - o Europe / Middle East / Africa
 - o Asia Pacific
- NOTE: there are 4 regions within Asia Pacific
- Asia Pacific (Singapore)
 - Asia Pacific (Tokyo)
 - Asia Pacific (Sydney) – launched in 2012
 - China (Beijing)

Companies that use Amazon Web Services/AWS include:

- Netflix
- Time Inc
- NASA JPL (NASA's Jet Propulsion Laboratory)

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- Lamborghini
- Airbnb
- Suncorp
- Kellogg's
- Adobe
- Vodafone

Reliable

Amazon offers a highly reliable environment where replacement instances can be rapidly and predictably commissioned. The service runs within Amazon's proven network infrastructure and data centers.

Secure

Amazon works in conjunction with Amazon VPC to provide security and robust networking functionality for your compute resources.

- Your compute instances are located in a Virtual Private Cloud (VPC) with an IP range that you specify. You decide which instances are exposed to the Internet and which remain private.
- Security Groups and networks ACLs allow you to control inbound and outbound network access to and from your instances.
- You can connect your existing IT infrastructure to resources in your VPC using industry-standard encrypted IPsec VPN connections.
- You can provision your resources as Dedicated Instances. Dedicated Instances are Amazon Instances that run on hardware dedicated to a single customer for additional isolation.

Cloud Products

Amazon Web Services offers a broad set of global compute, storage, database, analytics, application, and deployment services that help organizations move faster, lower IT costs, and scale applications. These services are trusted by the largest enterprises and the hottest start-ups to power a wide variety of workloads including: web and mobile applications, data processing and warehousing, storage, archive, and many others.