

Privacy Policy – Natural Strength

This Privacy Policy was last updated on 30 November 2023

1 Our commitment to privacy

- (1) Natural Strength Pty Ltd (ABN 73 672 418 370) (referred to as **we, us** or **our**) values and respects the privacy of the individuals we deal with and are committed to managing personal information in accordance with the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**) and in accordance with other applicable privacy laws.
- (2) We offer and provide the following services:
 - (a) The provision of a gym and associated facilities including, but not limited to, equipment, machinery and amenities.
 - (b) Health and fitness services at the Gym,
(Services).
- (3) We also provide individuals with access to the following website <https://naturalstrength.au/> and any app, mobile app and all other sites relating to our business and Services (**Sites**).
- (4) This Privacy Policy sets out how we collect, hold, use and disclose your personal information, and how we maintain the quality and security of your personal information.
- (5) Please read this Privacy Policy carefully, as by using our Services and/or Sites and providing personal information to us, you:
 - (a) are confirming that you have read this Privacy Policy;
 - (b) understand how your personal information will be handled by us; and
 - (c) consent to us handling your personal information in accordance with this Privacy Policy.

2 How do we interact with you via our Sites?

- (1) Where possible, you may visit our Sites without identifying yourself.
- (2) If you identify yourself, any personal information you provide to us will be managed in accordance with this Privacy Policy.
- (3) Our Sites may use cookies from time to time. A “cookie” is a small file stored on your computer's browser, which assists in managing customised settings of our Sites and delivering content. We may collect certain information about your access and use of our Sites, such as your device and network information, browser type and session, geo-location, IP address, pages you have accessed on our Sites and on third-party websites. You are not identifiable from such information, however if you choose to provide our Sites with personal information, that information could be linked to the data stored in the cookie.
- (4) You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our Sites.

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- (5) We may also use web beacons on our Sites from time to time. These web beacons monitor your behaviour and collect data about your viewing on a web page.
- (6) Our Sites may contain links to third-party websites that we have no control over. We are not responsible for the content or privacy practices of websites that are linked to our Sites.

3 What information do we collect about you?

- (1) We collect the types of personal information required to assist us in providing our Services, providing our Sites and fulfilling our functions and activities and informing you about them.
- (2) When you enquire about our Services or when you become a customer of ours, a record is made which includes your personal information.
- (3) The types of personal information that we collect will vary depending on the circumstances of collection, the nature of your dealings with us and the kind of Services that you request from us, but will typically include:
 - (a) details such as your name, date of birth, phone number, email address, residential address and postcode;
 - (b) financial information such as your credit/debit card details and bank account details;
 - (c) images or audio-visual recordings which identify you;
 - (d) your preferences and/or opinions; and
 - (e) any other personal information you provide to us (directly or indirectly), or authorise us to collect, as part of your interaction with us.
- (4) You can always decline to give us any personal information we request, but that may mean that:
 - (a) we cannot interact with you;
 - (b) we cannot provide you with some or all of our Services; and/or
 - (c) it may affect your use of the Sites and the offerings we make through the Sites.

4 Sensitive information

- (1) We will collect information from you which is considered sensitive information, being your health information.
- (2) Otherwise, in limited circumstances, we may collect sensitive information which may include information or opinions about your racial or ethnic origin, political opinions, political association, religious or philosophical beliefs, membership of a trade union or other professional body, sexual preferences or criminal record.
- (3) If we collect your sensitive information, we will do so only with your consent, if it is necessary to prevent a serious and imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.
- (4) We only collect, hold, use and disclose sensitive information for any purposes that you consent to, the primary purpose for which it is collected and secondary purposes that

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are directly related to the primary purpose for which it was collected and if otherwise required or authorised by law.

5 How and why do we collect and use your personal information?

5.1 How do we collect your personal information?

- (1) We generally collect personal information directly from you. We may collect and update your personal information when you interact with us over the phone, by email, over the internet and through our Sites, in person, when you participate in surveys or questionnaires, when you attend our events, when you subscribe to our mailing lists and if you apply for a position with us as part of a recruitment process.
- (2) We may also collect personal information about you from other sources, for example:
 - (a) third party suppliers and contractors who assist us to operate our business; and
 - (b) through publicly available sources.

5.2 Why do we collect your personal information?

- (1) We collect personal information reasonably necessary to carry on our business, to assess and manage our customer's needs, to provide our Sites and to provide our Services. We may also collect information to fulfil administrative functions associated with these Services, for example billing, entering into contracts with you or third parties and managing customer relationships.
- (2) The purposes for which we usually collect, use and disclose personal information depends on the nature of your interaction with us and are set out in section 9 of this Privacy Policy.

6 Can you deal with us anonymously?

- (1) We will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry).
- (2) Generally, it is not practicable for us to deal with individuals anonymously or pseudonymously on an ongoing basis.
- (3) If we do not collect personal information about you, you may be unable to utilise all or our Services or participate in our events, programs or activities we manage or deliver.

7 How do we hold information?

- (1) We store information in paper-based files or other electronic record keeping methods in secure databases (including trusted third party storage providers based in Australia).
- (2) Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.
- (3) We maintain physical security over paper and electronic data stores, such as through locks and security systems at our business premises'. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and

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other security systems such as user identifiers and passwords to control access to our computer systems.

- (4) Our Sites do not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our Sites are encouraged to exercise care in sending personal information via the internet.
- (5) We take steps to destroy or de-identify information that we no longer require.

8 Do we use or disclose your personal information for direct marketing?

- (1) We may use or disclose your personal information for the purpose of informing you about our Services, upcoming promotions and events, or other opportunities that may interest you.
- (2) If you do not want to receive direct marketing communications, you can:
 - (a) opt-out at any time by contacting us using the contact details set out in section 14 of this Privacy Policy; or
 - (b) use the unsubscribe / opt-out facility provided in the most recent marketing communication.
- (3) If you opt-out of receiving marketing material from us, we may still contact you in relation to our ongoing relationship with you.

9 How do we use and disclose personal information?

- (1) The purposes for which we may use and disclose your personal information will depend on the Services we are providing to you and the nature of your interaction with us.
- (2) We will use personal information you provide for the primary purposes of providing our Services and Sites, which includes but is not limited to:
 - (a) providing, delivering, administering and improving our Services and Sites, including but not limited to:
 - (i) offering you Site content;
 - (ii) providing and enhancing features of our Sites;
 - (iii) enabling you to use our Services; and
 - (iv) customising, researching, developing, measuring, expanding and improving our Services;
 - (b) personalising and improving your experience on the Sites and with our Services;
 - (c) dealing with feedback or complaints about our Sites or Services;
 - (d) contacting and communicating with you and providing customer support;
 - (e) managing, planning, advertising and administering programs, events and competitions;
 - (f) informing you of our activities, events, facilities and Services;

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- (g) undertaking data analytics, to better understand your requirements and preferences;
 - (h) conducting market research, business development and to innovate and improve our Services;
 - (i) monitoring online activity on our Sites;
 - (j) undertaking and administering marketing activities, database compilation and analytics, analysis of trends and demographics and other marketing or promotional activities, including but not limited to:
 - (i) personalising, measuring and improving our advertising;
 - (ii) contacting you to let you know about our Services; and
 - (iii) delivering direct and targeted advertising and marketing to you about our Services and business;
 - (k) enforcing our agreements with you;
 - (l) recruitment processes;
 - (m) responding to requests for information and other general enquires;
 - (n) complying with legal obligations to which we may be subject and to resolve our disputes, including but not limited to:
 - (i) participation in investigations and proceedings conducted by governmental or regulatory authorities and law enforcement;
 - (ii) prevention, detection and mitigation of unlawful activity or suspected unlawful activity;
 - (iii) compliance with information requests where we are legally obligated to disclose personal information;
 - (iv) retention and storage of your personal information to comply with specific legal retention requirements;
 - (v) responding to a serious threat to an individual's life or to public health or safety; and
 - (vi) where otherwise required or authorised by law.
- (3) We will generally use or disclose your personal information for the primary purpose for which it was collected, or for a related secondary purpose where you would reasonably expect us to use or disclose the personal information for that secondary purpose. We may otherwise use and disclose your personal information if you have given us consent in accordance with this Privacy Policy for the use or disclosure or it is required or authorised by law.
- (4) We may disclose personal information to third parties, including:
- (a) third parties we engage to provide services to us, including contractors and service providers used for data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance/development, archiving, debt collection, payment systems, professional advice, market research and marketing and advertising;

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- (b) our employees, contractors, agents, partners, sponsors, promoters and other third parties who assist us in providing our Services and Sites;
 - (c) any person who acquires, or intends to acquire, our business assets;
 - (d) courts, governmental and regulatory authorities and law enforcement, where required by law or to exercise or defend our legal rights; and
 - (e) other third parties when you have given consent to share your personal information.
- (5) Third parties to who we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.
- (6) We will also use and disclose personal information for a range of administrative, management and operational purposes. This includes:
- (a) administering billing and payments and debt recovery;
 - (b) planning, managing, monitoring and evaluating our Services;
 - (c) quality improvement activities;
 - (d) statistical analysis and reporting;
 - (e) training staff, contractors and other workers;
 - (f) risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
 - (g) responding to enquiries and complaints regarding our Services;
 - (h) obtaining advice from consultants and other professional advisers; and
 - (i) responding to subpoenas and other legal orders and obligations.
- (7) We may use and disclose your personal information for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.

10 Do we disclose your personal information overseas?

- (1) Unless we have your consent or an exception under the APPs applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your personal information.
- (2) Please note that some of the third-party service providers that we may disclose personal information to may be based in or have servers located outside of Australia and may therefore store, transfer or access your personal information outside of Australia.

11 How can you access or seek correction of your personal information?

- (1) You are entitled to access your personal information held by us on request. To request access to your personal information please contact us using the contact details set out in section 14 of this Privacy Policy.

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- (2) You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.
- (3) We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.
- (4) However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.
- (5) We may decline your request to access or correct your personal information in certain circumstances in accordance with the APPs. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

12 What should you do if you have a complaint about the handling of your personal information?

- (1) You may contact us at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.
- (2) You may make a complaint about privacy at the contact details set out in section 14 of this Privacy Policy
- (3) We will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within seven (7) days.
- (4) If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within seven (7) days and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.
- (5) In most cases, we will investigate and respond to a complaint within thirty (30) days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.
- (6) If you are not satisfied with our response to your complaint, or you consider that we may have breached the APPs or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner.
- (7) The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au.

13 How changes are made to this Privacy Policy

We may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our Sites regularly to keep up to date with any changes.

14 How can you contact us?

Our contact details are as follows:

- (1) Address: Unit 1 79-81 Boundary Road, Mortdale NSW 2223.
 - (2) Email: admin@naturalstrength.au
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