

# PRIVACY POLICY

## 1. The Body Method commitment to privacy

- (a) The Body Method (ABN: 96734828872), its subsidiaries and affiliates in Australia (collectively referred to as "we" and "us") are committed to managing personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth) and in accordance with other applicable privacy laws.
- (b) This document sets out our policies for managing your personal information and is referred to as our Privacy Policy.
- (c) In this Privacy Policy, "we" and "us" refers to The Body Method and "you" refers to any individual about whom we collect personal information.

## 2. About The Body Method

- (a) The Body Method is a Pilates, Yoga and Wellness Studio.
- (b) The Body Method offers a complete range of services, including Reformer and Mat Pilates, Yoga, Barre, Modfit, Meditation and Stretch classes, Holistic Health and Nutrition, Chiropractic, Exercise Physiology and Esoteric Healing.
- (c) Please contact us for a full list of the companies which comprise The Body Method and which are subject to this Privacy Policy.

## 3. What information does The Body Method collect about you?

### 3.1. Clients and prospective clients

- (i) When you enquire about our services or when you become a client of The Body Method, a record is made which includes your personal information.
- (ii) The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:
  - (A) your name, e-mail, postal address and other contact details;
  - (B) information about your health, nutrition, wellbeing and personal exercise habits;
  - (C) any additional personal information you provide to us, or authorise us to
  - (D) collect, as part of your interaction with The Body Method.

### 3.2. Prospective employees or applicants

- (i) We collect personal information when recruiting personnel, such as your name, contact details, qualifications and work history. Generally, we will collect this information directly from you.

- (ii) We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions (for example, positions which involve working with children).

### **3.3. Other individuals**

- (i) The Body Method may collect personal information about other individuals who are not clients of The Body Method. This includes customers and members of the public who participate in events we are involved with, individual service providers and contractors to The Body Method, and other individuals who interact with The Body Method on a commercial basis. The kinds of personal information we collect will depend on the capacity in which you are dealing with The Body Method.
- (ii) If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.
- (iii) In limited circumstances, The Body Method may collect information which is considered sensitive information. For example, if you are injured at an event promoted or delivered by The Body Method we may collect health information about you in an emergency or otherwise with your consent.
- (iv) We may collect personal information about children (for example, when children participate in events we are involved with). Where children do not have sufficient maturity and understanding to make decisions about their personal information, we will require their parents or guardians to make decisions on their behalf.
- (v) You can always decline to give The Body Method any personal information we request, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about personal information we have requested, please let us know.

### **3.4. Visitors to our websites**

The way in which we handle the personal information of visitors to our websites is discussed below.

## **4. How and why does The Body Method collect and use your personal information?**

- (a) The Body Method collects personal information reasonably necessary to carry out our business, to assess and manage our clients' needs, and provide services including Reformer and Mat Pilates, Yoga, Barre, Modfit, Meditation and Stretch classes, Holistic Health and Nutrition, Chiropractic, Exercise Physiology and Esoteric Healing.. 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 client relationships.

- (b) The purposes for which The Body Method usually collects and uses personal information depends on the nature of your interaction with us, but may include:
  - (i) responding to requests for information and other general inquiries;
  - (ii) managing, planning, advertising and administering programs, events, competitions and performances;
  - (iii) researching, developing and expanding our facilities and services;
  - (iv) informing you of our activities, events, facilities and services;
  - (v) recruitment processes (including for volunteers, internships and work experience);
  - (vi) responding to enquires and complaints; and
  - (vii) booking classes and consultations and prescribing treatment plans.
- (c) The Body Method generally collects personal information directly from you. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person. We may also collect personal information about you from other sources, for example:
  - (i) our affiliated and related companies;
  - (ii) third party suppliers and contractors who assist us to operate our business; and
  - (iii) .
- (d) The Body Method also collects and uses personal information for market research purposes and to innovate our delivery of products and services.

## **5. How does The Body Method interact with you via the internet?**

- (a) You may visit our website ([www.thebodymethod.com.au](http://www.thebodymethod.com.au)) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to The Body Method will be managed in accordance with this Privacy Policy.
- (b) The Body Method's website uses cookies. A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites. You are not identifiable from such information.
- (c) 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 website.
- (d) The Body Method's website may contain links to third-party websites. The Body Method is not responsible for the content or privacy practices of websites that are linked to our website.

## **6. Can you deal with The Body Method anonymously?**

The Body Method will provide individuals with the opportunity to remain anonymous or use a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for The Body Method to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs or activities we manage or deliver.

## **7. How does The Body Method hold information?**

- (a) The Body Method stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third party storage providers based in Australia or overseas). 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.
- (b) The Body Method maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.
- (c) Our websites do not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our websites are encouraged to exercise care in sending personal information via the internet.
- (d) We take steps to destroy or de-identify information that we no longer require.

## **8. Does The Body Method use or disclose your personal information for direct marketing?**

- (a) The Body Method 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. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.
- (b) If you opt-out of receiving marketing material from us, The Body Method may still contact you in relation to its ongoing relationship with you.

## **9. How does The Body Method use and disclose personal information?**

### **9.1. For clients**

The purposes for which we may use and disclose your personal information will depend on the services we are providing you. For example, if you have engaged us to deliver a service, we may disclose information about you to service providers where this is relevant to our services.

## **9.2. For customers and participants**

If you are a customer or participant in an event, we may disclose your personal information to our clients and venues where this is reasonably necessary for, and relevant to, the delivery of the event. We may use images or audio-visual recordings which identify you for promotional purposes where you would reasonably expect this to occur.

## **9.3. Disclosure to contractors and other service providers**

- (i) The Body Method may disclose information to third parties we engage in order to provide our services, including contractors and service providers used for data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance/development, printing, archiving, mail-outs, and market research.
- (ii) Personal information may also be shared between related and affiliated companies of The Body Method, located in Australia or overseas.
- (iii) Third parties to whom 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.

## **9.4. Use and disclosure for administration and management**

The Body Method will also use and disclose personal information for a range of administrative, management and operational purposes. This includes:

- (i) administering billing and payments and debt recovery;
- (ii) planning, managing, monitoring and evaluating our services;
- (iii) quality improvement activities;
- (iv) statistical analysis and reporting;
- (v) training staff, contractors and other workers;
- (vi) risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- (vii) responding to enquiries and complaints regarding our services;
- (viii) obtaining advice from consultants and other professional advisers; and
- (ix) responding to subpoenas and other legal orders and obligations.

## **9.5. Other uses and disclosures**

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. Does The Body Method disclose your personal information overseas?**

- (a) The Body Method is a global organisation and works with clients, service providers, sponsors and commercial interests across the globe. It is likely that your personal information will be disclosed to overseas recipients.
- (b) Unless we have your consent, or an exception under the Australian Privacy Principles 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 Australian Privacy Principles in relation to your personal information.
- (c) Entities which are related entities of The Body Method or are otherwise affiliated with The Body Method in North America, South America, Europe, Africa, Asia, Southeast Asia, Antarctica, Middle East, Africa. In circumstances where your information is disclosed to overseas recipients, those recipients are likely to be located in countries in the regions in which The Body Method and its related entities and affiliates operate.

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

- (a) You are entitled to access your personal information held by The Body Method on request. To request access to your personal information please contact our privacy officer using the contact details set out below.
- (b) 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.
- (c) 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.
- (d) 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.
- (e) We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. 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?**

- (a) You may contact The Body Method 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.
- (b) You may make a complaint about privacy to the privacy officer at the contact details set out below.
- (c) The privacy officer 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 a week.
- (d) If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week 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.
- (e) In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.
- (f) If you are not satisfied with our response to your complaint, or you consider that The Body Method may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. 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](http://www.oaic.gov.au)).

## **13. How changes are made to this Privacy Policy?**

The Body Method may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website ([www.thebodymethod.com.au](http://www.thebodymethod.com.au)) regularly to keep up to date with any changes.

## **14. How can you contact The Body Method?**

The contact details for The Body Method are:

- (a) The Body Method privacy officer: Sarah Callaham
- (b) 3/5 Toolona Street, Tugun, Queensland, 4224
- (c) [hello@thebodymethod.com.au](mailto:hello@thebodymethod.com.au)

This Privacy Policy was last updated on 1st July 2022