PRIVACY POLICY

Emma Edwards trading as The Broke Generation A.B.N.43 825 488 363 (**we**, **us**, **our**, or **The Broke Generation**) recognises and values the protection of your personal information.

We recognise that you have an interest in our collection and use of your personal information via our website, which is located at www.thebrokegeneration.com (the **Website**). We have implemented this Privacy Policy in order to be open and transparent about how we collect, hold, and use your personal information, and under what circumstances we may disclose or transfer your personal information. This Privacy Policy also outlines your rights to gain access to, and seek corrections of, your personal information we hold. Finally, this Privacy Policy provides information about how you can approach us about your privacy-related concerns and complaints, and how we will deal with such communications.

This Privacy Policy applies to information that The Broke Generation collects via this Website.

Please note that this Website Privacy Policy forms part of the Terms of Use and Payment & Refund Terms documents, which may be accessed via the Website.

RESIDENTS OF THE EUROPEAN ECONOMIC AREA

This is an Australian website that is subject to laws of Australia. However, if you're a resident of any country that the General Data Protection Regulation (GDPR) applies to our activities, then please click here to learn about how we collect, share and use your personal information, and how you may exercise your privacy rights.

NON-RESIDENTS OF THE EUROPEAN ECONOMIC AREA

Privacy relating to persons under the age of 16 years

We do not knowingly collect personally identifiable information from anyone under the age of 16. You must not provide us with your personal information, if you are under the age of 16, without the consent of your parent, guardian or educational institution.

Information we collect and hold

From time to time, we may ask you to supply personal information such as your name, grade year (if applicable) or e-mail address. However, under no circumstances will we request any information from you that may disclose your:

- political, religious or philosophical opinions, beliefs, associations or affiliations;
- health and sexuality;
- racial or ethnic origin;
- membership of a trade union, or a professional or trade association; or
- criminal records.

Personal information via the Website

Most commercial websites use 'cookies', which are pieces of information that websites send to the browser and are stored in the computer hard-drive. Cookies make using the Website easier by storing information about your preferences on the Website. This allows the Website to be tailored to you for any of your return visits. Cookies will not identify you personally.

If you would prefer not to receive cookies, you can alter your security settings on your web browser to disable cookies or to warn you when cookies are being used. However, by disabling the cookie function in your web browser you may impede your ability to use parts of the Website.

Your option not to provide your personal information

Providing us with your personal information is absolutely optional, but may be necessary for us to provide you with our services. Whenever it is optional for you to provide us with non-essential personal information, we will make this clear to you. When you provide us with your personal information, you are consenting to our storage, use and disclosure of that information as outlined in this Website Privacy Policy.

Use and disclosure of your personal information

When we hold your personal information it will be used for the following primary purposes:

1. to ensure the proper functioning of the Website;

2. to ensure the proper functioning of the The Broke Generation business and operations; and/r

3. to provide you with a free of charge letter and/or detailed personal report, as purchased via the Website.

We will not use or disclose (or permit the use or disclosure of) information that could be used to identify you in any circumstances except:

- to ensure the proper functioning of our organisation and the Website;

- provide you with a free of charge letter and/or detailed personal report, as purchased via the Website;

- where the law requires us, or authorises us, or a company holding data on our behalf, to do so; or

- where you have given express consent to us for a prescribed purpose.

We will not sell, distribute, rent, licence, disclose, share or pass your personal information onto any third party.

Should a third party approach us with a demand to access your personal information, we will take reasonable steps to redirect the third party to request the information directly from you, wherever it is lawful and reasonable for us to do so.

If we are compelled to disclose your personal information, to a third party we will take reasonable steps to notify you of this in advance, wherever it is lawful and reasonable for us to do so.

Security of personal information

In our organisation, personal information may be stored both electronically and in hard-copy form. We are committed to keeping your personal information secure regardless of the format in which we hold it and we take all reasonable steps to protect your information from misuse, interference, loss, and unauthorised access,

modification or disclosure. However, you use the Website at your own risk and we accept no responsibility, whether we are deemed to have been negligent or not, in the event of a security that affects your privacy.

Note that no information transmitted over the Internet can be guaranteed to be completely secure. However, we will endeavour to protect your personal information as best as possible but we cannot guarantee the security of any information that you transmit to us, or receive from us. The transmission and exchange of information is carried out at your own risk.

Accuracy and quality of personal information

We will take all such steps as are reasonable in the circumstances to ensure that:

- all information collected from you is kept accurate, up to date and complete; and

- the personal information that we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant.

Access to your personal information

In most cases, you have the right to access the personal information that we hold about you. If you wish to access your personal information, please contact our Privacy Officer at hello@thebrokegeneration.com.

We will deal with all requests for access to personal information as quickly as possible. Requests for a large amount of information, or information that is not currently in use, may require further time before a response can be given.

We may charge you a reasonable fee for access if a cost is incurred by us in order to retrieve your information, but in no case will we charge you a fee for your application for access.

Whenever a fee will be applied, you will be notified of how that fee will be calculated, or where possible, the total amount that will be charged. You will then have the option to decide whether to proceed with your access request.

In some cases, we will refuse to give you access to personal information we hold about you. This includes, but is not limited to, circumstances where denying access is required or authorised by or under an Australian law or a court/tribunal order or where giving you access would be unlawful; have an unreasonable impact on other people's privacy; prejudice an investigation of unlawful activity; reveal our intentions in relation to negotiations with you so as to prejudice those negotiations; prejudice enforcement related activities conducted by, or on behalf of, an enforcement body; reveal evaluative information generated within the The Broke Generation business in connection with a commercially sensitive decision-making process.

We will also refuse access where the personal information relates to existing or anticipated legal proceedings, and the information would not be accessible by the process of discovery in those proceedings. Further, we will refuse access where your request is frivolous or vexatious, and where we reasonably believe that: giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; unlawful activity, or misconduct of a serious nature, is being or may be engaged in against The Broke Generation and giving access would be likely to prejudice the taking of appropriate action in relation to that matter.

If we refuse to give you access we will provide you with reasons for our refusal, unless doing so would be unreasonable in the circumstances. We will also take reasonable steps to give you access in a way that meets your needs without giving rise to the reasons of our refusal. Further, we will provide details of how you may make a complaint about our decision.

These mechanisms for accessing your personal information operate alongside, and do not replace, other informal or legal procedures by which you may be provided with access to your personal information.

Correction of your personal information

The accuracy of the personal information we have requested from you is important to us. Should you suspect, or become aware of, that your personal information we hold is inaccurate, out of date, incomplete or misleading, please contact our Privacy Officer at hello@thebrokegeneration.com.

We will deal with all requests for correction of personal information as quickly as possible. Requests relating to a large amount of information, or information which is not currently in use, may require further time before a response can be given.

If we refuse to change the personal information as you request, we will provide you with reasons for our refusal, unless doing to would be unreasonable in the circumstances. We will also provide details of how you may make a complaint about our decision. Further, in case of our refusal, you may request that we take reasonable steps to associate, with the relevant information, a statement that you view it as inaccurate, out of date, incomplete or misleading.

In the case we have corrected personal information about you, you may request that we take reasonable steps to give notice of the correction to any third party to which we have disclosed the inaccurate, out of date, incomplete or misleading personal information.

These mechanisms for correcting your personal information operate alongside, and do not replace, other informal or legal procedures by which you may be provided correction of your personal information.

Overseas transfer of personal information

We may transfer your personal information to overseas recipients. However, we will seek your consent prior to disclosing your information if the overseas recipient is not regulated in a way that equally reflects the Australian Privacy Principles. We will take reasonable steps to ensure an overseas recipient does not breach the requirements of the *Privacy Act 1988* (Cth).

Concerns and complaints about breaches

If you have concerns about how we handle your personal information, it is important that you notify us as soon as possible, so that we can address your concerns appropriately as the circumstances require. Any concern or complaint should be made in writing. Please send it to our Privacy Officer at hello@thebrokegeneration.com and we will respond as soon as reasonably possible. Alternatively, you may contact the Office of the Australian Information Commissioner with your concern. Information about lodging a complaint is available on the Office of the Australian Information Commissioner's website (see in particular: http://www.oaic.gov.au/privacy/privacy-complaints).

Disposal of personal information not required

If we hold personal information about you, and we do not need that information for any purpose for which the information may be used or disclosed, we will take reasonable steps to destroy or de-identify that information unless we are prevented from doing so by law.

Unsubscribing from our e-mail database

To unsubscribe from our e-mail database, please send us an e-mail to hello@thebrokegeneration.com with "UNSUBSCRIBE" typed into the subject line of the email.

Contacting us

If you have any questions, concerns or ideas about how we could improve our Privacy Policy, please contact our Privacy Officer at hello@thebrokegeneration.com. Where you provide suggestions, materials or feedback it is considered non-confidential and we may, at our complete discretion, use it to improve the Website, service and/or how we handle personal information without any obligation to compensate you regardless of how we use, implement, copy, modify, display, distribute and/or otherwise benefit from your suggestions, materials or feedback.

Amendments of this Privacy Policy

We are obligated to regularly review and update this Privacy Policy. We therefore reserve the right to amend this Privacy Policy at any time. Should any significant amendments occur, notification will be provided by publication on the Website 14 days prior to the changes being implemented (the **Notice Period**) unless the circumstances of the amendments makes it unreasonable to provide such a Notice Period. Your continued use after the Notice Period has lapsed indicates your consent to be bound by the amended Privacy Policy.

For further information about privacy in general, please refer to the Office of the Australian Information Commissioner's website located at http://www.oaic.gov.au.

This Privacy Policy was last updated on 6 September 2020. To download a PDF version of this Privacy Policy, click here. Alternatively, please contact our Privacy Officer at hello@thebrokegeneration.com and we will gladly send you a copy free of charge.