

Inlusee Ltd Privacy Policy

Our Commitment to Privacy

Inlusee Ltd and its related entities are committed to managing personal information in accordance with the [Australian Privacy Principles under the Privacy Act 1988](#) (Cth) (**Privacy Act**).

This document explains how and why we collect, use, hold and disclose your personal information and is referred to as our Privacy Policy.

In this Privacy Policy, “**Inlusee**”, “**we**” and “**us**” refers to **Inlusee Ltd** and “**you**” refers to any individual about whom we collect personal information.

About us

Inlusee operates a number of connection-based programs aimed at reducing isolation and loneliness for Australians, using volunteers to provide companionship to those in need.

What is personal information?

Here at Inlusee, we recognise the privilege you give us when you entrust us with your personal information and are fully committed to protecting your privacy and developing a service that provides you with a safe online experience.

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information whether or not it is true.

What information do we collect about you?

We obtain personal information about you when you visit our website, when you contact us or when you use our services and programs.

You may provide us with basic information such as your name, date of birth, phone number, postal address and email address.

If you sign up for one of our programs, we will collect the information that you provide to us via our onboarding process, information about the programs that you

participate in, the frequency of your attendance, and any other information that may be identified by our employees, communicated by you or by third parties relating to your general care or wellbeing.

In order to help us to run our programs more effectively we may collect personal health information about you including whether you have a disability or any other information that you provide to us that may be relevant to the way we provide you with our service. This information may amount to sensitive information as defined in the Privacy Act and will be handled in accordance with this Privacy Policy and applicable laws. This information is essential to ensure that we can tailor our services to meet your individual needs and to offer the best possible support during your participation in our programs.

We may need this information to ensure that we can appropriately respond if any health-related issues arise during your participation in any virtual sessions or other remote activities. It will also help us to ensure that we have the necessary support or emergency protocols in place, allowing us to contact appropriate emergency services or individuals (e.g. family members or caregivers) if needed.

If you sign up with us as a volunteer or are an employee, we may collect additional information about you including your criminal history via criminal checks, information disclosed by your referees and any other information that you provide to us, or we discover as part of the interview and on-boarding process.

We may also collect additional personal information that you provide to us, or authorise us to collect, as part of your interactions with us.

We may also collect information relating to your participation in our programs and the outcomes experienced by participants. This may include participant surveys, feedback, wellbeing outcomes, loneliness or social connection outcomes, digital confidence, social confidence, development of interests or skills, attendance and participation metrics, testimonials, participant stories, case studies and other information used to evaluate, improve and report on the effectiveness and impact of our programs.

Where appropriate consent has been obtained, we may also collect and use photographs, videos, audio recordings, testimonials, participant stories and related information for educational, promotional, reporting, fundraising and impact measurement purposes.

How do we collect your personal information?

Direct interactions: We collect information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website, interact on our social media pages, apply for a job, use a “Request for Services” form, apply for a role as a volunteer, telephone us or send us an email and when we provide our services and programs to you.

We may also collect personal information about you (including sensitive information such as health information and police checks) from other sources, such as third parties or persons or organisations who have referred program participants to our services.

‘Cookies’, automated technologies and interactions: We use cookies, website analytics tools, website monitoring tools, advertising technologies, social media integrations and similar technologies to understand how visitors use our website, improve our services, measure the effectiveness of our communications and marketing activities, and enhance user experience.

These technologies may collect information such as device information, browser information, IP addresses, pages visited, referring websites, usage patterns and interactions with our website and online content. It is possible that you may be directly or indirectly identifiable from some of this information.

We may also use services provided by third party analytics and technology providers to assist us in understanding website traffic, website performance and user engagement. To find out how those providers process information, please refer to their respective privacy policies.

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 and app.

Why do we collect and use your personal information?

We collect personal information as reasonably necessary to carry out our business and to provide our programs, which may include (but is not limited to);

- delivery of our social connection services and programs;

- to recruit and manage our volunteers;
- comply with legal or regulatory obligations imposed on us;
- conduct internal audits;
- meeting our reporting obligations to government bodies;
- contacting and communicating with you including responding to queries, complaints and feedback from you;
- to ensure the proper functioning of our website, our business and operations;
- to assist us with marketing, product and service development and research requirements;
- to manage our employment or business relationship with you;
- advertising and marketing our products and services;
- measuring, evaluating and reporting on the effectiveness, outcomes and social impact of our programs and services;
- preparing reports, research, case studies and impact reporting for government bodies, stakeholders, funders and the broader community;
- administering participant surveys, feedback activities, program evaluations and quality improvement initiatives; or
- improving our programs, services, participant experiences and volunteer engagement activities.

Use of artificial intelligence and technology tools

We may use approved technology tools, including artificial intelligence assisted functionality that forms part of our authorised business systems, to assist with administration, communications, analysis, reporting, service delivery and operational efficiency.

These tools may assist us with preparing summaries, analysing information, generating reports, supporting communications and improving our services. We do not use artificial intelligence systems to make automated decisions that have a legal or similarly significant effect on individuals without appropriate human oversight.

Unsolicited information

If we receive personal information about you without it being requested, it will be treated in the same way as any other personal information.

Who do we disclose your personal information to?

- We may disclose the personal information of program participants to government bodies but only to the extent that is required to comply with our funding obligations.
- We may disclose personal information to third party service providers who host, process, store, analyse, back up, support or secure information on our behalf, including providers of cloud services, customer relationship management systems, communication platforms, website hosting services, website support services, analytics services, marketing services, accounting systems and other business technology services.
- We may disclose information to third parties we engage in order to run our business or as necessary to provide the programs to program participants.
- We disclose personal information of participants to our volunteers. Our volunteers are required to sign confidentiality agreements as part of their on-boarding process with us. If we disclose participant health information to our volunteers (for example, disability or vision issues) it will only be for the purposes of helping the volunteers to better tailor their visits and meetings with the participant.
- We may disclose the information of participants to that participant's representative or other third parties involved in the participants direct care, where we, or our volunteers have concerns or identify issues with the participants care or wellbeing.
- We may from time to time need to disclose personal information where we believe it is necessary to comply with a legal requirement or law.
- If we or one of our volunteers forms the view that there is an imminent risk to a participant's health and safety we may need to share their personal information with emergency services or health professionals.

- We may disclose a participant's personal information to third parties, where we form the view that the participant would benefit from the services of the third parties, for example, free counselling services. We will always obtain the consent of the participant in these circumstances and provide you with details on how to opt-out of future offerings.
- We currently use a range of technology and service providers to support our operations. These providers may include cloud service providers, customer relationship management providers, communication platforms, website hosting providers, website support providers, accounting systems, marketing providers and analytics providers. Personal information may be processed, stored, accessed or backed up through those systems as part of our normal operations.
- If there is a change of control in our business (for example a sale of the business) your personal information could be disclosed to a potential purchaser under a confidentiality agreement.
- We may share your personal information with related and affiliated companies located in Australia and overseas.
- We may use and disclose your personal information for other purposes explained at the time of collection with your consent.

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

When you provide us with your contact details, you give your consent to us using your personal information to provide you with information and to tell you about things which we consider may be of interest to you, including by post, email, SMS, messaging applications and telephone (**Direct Marketing Communications**).

If at any time you do not wish to receive any further Direct Marketing Communications, you may do this at any time by using the "unsubscribe" facility included in the Direct Marketing Communication or by contacting us at the details set out at the end of this document.

If you opt-out of receiving our Direct Marketing Communications, we may still contact you in relation to our ongoing relationship with you.

Do we disclose your personal information overseas?

We use a range of cloud-based, communications, website, technology, analytics, marketing and business support providers to assist us in delivering our services and operating our business.

As a result, personal information may be stored, processed, accessed, transferred or backed up outside Australia. This may occur through cloud infrastructure, software services, communications platforms, website providers, analytics tools, support services and disaster recovery or backup arrangements.

The countries in which personal information may be stored, processed or accessed may change from time to time depending on the service providers we use and the services they provide.

Where personal information is disclosed outside Australia, we take reasonable steps to ensure that recipients appropriately protect personal information and handle it in a manner consistent with applicable privacy laws.

Can you deal with us anonymously?

Providing us with your personal information is optional and you may be able to remain anonymous or use a pseudonym when interacting with us. However, it may not always be possible for this to occur especially when you are a participant in our connection programs. We will inform you if you are unable to remain anonymous or use a pseudonym when dealing with us.

How do we hold your information?

We maintain physical, electronic and managerial security to safeguard and secure your personal information.

To the extent permitted by law, we take reasonable steps to destroy or permanently de-identify personal information when it is no longer reasonably required for the purposes for which it was collected, to comply with legal obligations, resolve disputes, maintain records or protect our legitimate interests.

Links to third-party websites

Our website may contain links to third-party websites. We do not have any control over and are not responsible for the content or privacy practices of websites that are linked to our website. You access and use any linked website at your own risk.

You should read the privacy policies on any linked website and only access and use the linked websites if you agree to the terms of those privacy policies.

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

Please let us know if there are any errors in your personal information and keep us up to date with changes to your personal information (such as your name or address). You can request access to any personal information relating to you which we hold. You can also request that we correct information if it is inaccurate or incomplete.

Please contact us via the details set out at the end of this document if you wish to access or correct any personal information, we have about you.

Doxxing and unauthorised disclosure

Doxxing refers to the publication or disclosure of an individual's personal information without consent with the intent or effect of causing harm, harassment, intimidation or distress. We will not knowingly collect, publish or facilitate the publication of personal information in a way that could lead to harm or harassment.

In addition, we strictly prohibit any use of Inclusee to dox, expose or maliciously share another participant's information. This includes sharing private or identifying information without consent, encouraging others to target a person based on shared data or uploading or linking to content designed to expose someone's identity against their will.

We will take all reasonable steps to remove or restrict access to any personal information that is disclosed in breach of this Privacy Policy or the Privacy Act. If you believe your personal information has been doxxed or misused in connection with our services, please contact our Privacy Officer on the details below. We may also report serious doxxing incidents to the Office of the Australian Information Commissioner (OAIC) and law enforcement as appropriate.

Data breaches

We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

If a data breach involving personal information occurs and notification is required under applicable law, we will investigate the incident and notify affected individuals and relevant regulators as required by law.

What if you have a complaint?

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 using the contact details at the end of this document.

If you are not satisfied with our response to your complaint, you may contact 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/.

How are changes made to this privacy policy?

We will review this policy regularly and we may update it from time to time. We recommend that you visit our website regularly to keep up to date with any changes.

How can you contact us?

Please [contact us](#) through our contact form.

Policy compliance statement

Responsible Executive:	CEO	Date of Review:	September 2026
Approved by:	Inclusee Ltd Board	Date of Next Review:	September 2027