1 Privacy Policy

- 1.1 This service is provided by H Narayan Pty Ltd ACN 970 443 119 (Vision Freedom Academy).
- 1.2 We are committed to our customer's privacy and the proper use and security of their personal information. We comply with the Australian Privacy Principles. You can find out more above the Principles at https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-guidelines
- 1.3 This Privacy Policy informs you how we treat personal information you provide to us. Your use of our application affirms your agreement to our Privacy Policy which may be updated from time to time without notice to you.

2 Kinds of Information

- 2.1 We may collect personal information which includes:
 - (a) names;
 - (b) residential addresses;
 - (c) postal addresses;
 - (d) email addresses;
 - (e) telephone numbers; and
 - (f) location data.

3 Third Party Service Providers

- 3.1 Vision Freedom Academy may use third-party services that may collect information used to identify you including the kinds of personal information described above.
- 3.2 We may employ third-party companies and individuals for the following reasons:
 - (a) to facilitate our Services;
 - (b) to provide the Service on our behalf;
 - (c) to perform service-related services; or
 - (d) to assist us in analysing how our Service is used.
- 3.3 We want to inform users of this Service that these third parties may have access to your personal information. The reason is to perform tasks assigned to them on our behalf. These third-party providers have an obligation not to disclose or other use the information for any other purpose.
- 3.4 We refer you to the privacy policy of the third-party service providers used by the Vision Freedom Academy:
 - (a) <u>Google Play Services</u> (including Google Calendar);

- (b) Google Meet;
- (c) Zoom Privacy Statement;
- (d) Google API Services User Data Policy;
- (e) Stripe;
- (f) Calendly; and
- (g) PayPal.
- 3.5 Vision Freedom Academy use and transfer to any other application of information received from Google APIs will adhere to Google API Services User Data Policy including Limited Use requirements.
- 3.6 Vision Freedom Academy makes use of the Zoom platform to facilitate its services. Vision Freedom Academy will provide its services in accordance and will adhere to Zoom's privacy policies.
- 3.7 To avoid doubt, Vision Freedom Academy utilises the Stripe platform but does not store any credit card information of the user.

4 Collection and Storage

- 4.1 We collect personal information provided by persons that use our application.
- 4.2 We retain your personal information and data for different periods of time depending on the type of data and how we use it. Some of your data may be retained by us until you cease use of our Service or otherwise instruct us to destroy the data.
- 4.3 We will retain some of your data for longer periods of time as necessary and as per the requirement of any statutory or legal authority or for legitimate business purposes, such as security and record-keeping.
- 4.4 When we delete your data, we will follow a deletion process to ensure that your data is both safely and completely removed from our servers or retained in an anonymised form.
- 4.5 We may also collect personal information through Google Analytics. The use, collection and storage of your personal information that is collected through Google Analytics or any third-party will be done in accordance with this Privacy Policy and the terms of the respective third-party provider's privacy policies.
- 4.6 When you provide us personal information, you are giving us your consent to collect and use that information in accordance with this policy.
- 4.7 You may choose not to provide us personal information, though if you do not you may be unable to access our full services and content.
- 4.8 Vision Freedom Academy may collect data and analytics to improve the safety, reliability and quality of the services provided by Vision Freedom Academy. This may include sharing data that has been collected with third parties. Any data that is shared with a third party will be dealt with in accordance with this privacy policy and any applicable privacy policy of the recipient.

5 Purposes

- 5.1 We collect personal information to provide and facilitate our Service and to help improve our services.
- 5.2 We do not sell personally identifying information with third parties. However, we may disclose such information with businesses that perform special functions for us like web host companies. We will only provide the information necessary for the special function and the business cannot use that information for any other purpose.
- 5.3 We also reserve the right to exercise our own judgment in disclosing personally identifying information to comply with lawful requests, laws and regulations, government requests or in special cases (such as identity theft protection).

6 Security

- 6.1 We value your trust in providing your personal information, we are striving to use commercially acceptable means of protecting your personal information. Users of the Services are to be advised that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, we cannot guarantee its absolute security.
- 6.2 Vision Freedom Academy will endeavour to notify its users where there is a suspected security breach or where user's personal information is at risk for any reason.

7 Log Data

7.1 We want to inform you that whenever you use our Services, in a case of an error in the app, we collect data and information (through third party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol (IP) address, device name, operating system version, the configuration of the app when utilising our Service, the time and date of your use of the Service, and other statistics.

8 Access and Correction

- 8.1 At any time, you can access the personal information we hold related to you by emailing us at visionfreedomacademy@gmail.com. We will endeavour to promptly provide you with a copy of your information.
- 8.2 If any personal information about you that we hold is out-of-date or incorrect, at any time you can correct that information by emailing or writing to us using the details above. We will take reasonable steps to promptly correct your information.
- 8.3 At any time, you can request that we delete any personal information about you that we hold by emailing or writing to us using the details above. We will take reasonable steps to promptly delete your information (and have any third parties to whom we have provided your information delete your information).
- 8.4 We note for you that we may be required to store your data as required by law or subject to any statutory record keeping requirements. In the instance that we are unable to delete any aspect of your personal information and data, we will endeavour to de-personalise the data we store to the extent required to satisfy any law or statutory requirement.

9 Complaints

- 9.1 If you have a concern or complaint about the personal information we hold related to you, or you think we may have breached any of the Australian Privacy Principles, you can contact us at any time by emailing us at visionfreedomacademy@gmail.com.
- 9.2 We will endeavour to reply within 30 days. If we are in breach of the Australian Privacy Principals, or we think there is something we can do better, we will promptly take reasonable steps to rectify the issue. If we decide not to act, we will explain our reasons to you.
- 9.3 You can find out more information about how to make a complaint here: https://www.oaic.gov.au/privacy/privacy-complaints/complain-to-an-organisation-or-agency/. If we do not respond within 30 days, or you are not satisfied with our response, you can contact the Office of the Australian Information Commissioner at: https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/.

10 Overseas Recipients

- 10.1 We do not ordinarily disclose your personal information to overseas recipients. However, from time to time we may disclose your personal information to overseas businesses that perform special functions for us. For example, we may use a web service provider with facilities in another country. In that case, your personal information may be stored overseas.
- 10.2 We will take reasonable steps to ensure that all overseas recipients of your personal information comply with the Australian Privacy Principles.
- 10.3 If we do provide personal information to overseas businesses, the most likely country of recipients of the information is the USA.
- 10.4 As mentioned below, we use Google Analytics (see Item 12). That is operated by Google, a company based in the USA. If Google Analytics obtains information about you when you use our websites, that information may be stored in the USA or another country.

11 Cookies

- 11.1 We use "cookies": small text files stored on your device that record details of your interactions with our websites. You can set your browser to alert you to cookies and choose whether to accept or reject them. You may still use our websites if you choose not to accept cookies and even if accepted you can delete cookies at any time. If you do not accept cookies or delete cookies, you may be unable to use parts of our website.
- 11.2 Vision Freedom Academy does not use these 'cookies' explicitly. However, Vision Freedom Academy may use third party code and libraries that use 'cookies to collect information to improve their services. You have the option to either accept or refuse these 'cookies' and

know when a 'cookie' is being sent to your device. We advise that should you choose to refuse our 'cookies' you may not be able to access or use some portions of Vision Freedom Academy.

12 Google Analytics

- 12.1 We use Google Analytics by Google Inc of 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA. You can find out more about how Google uses data when you use our site at www.google.com/policies/privacy/partners/.
- 12.2 Google Analytics is a web analytics service that gathers, sorts and analyses data from visitors of websites (such as which website a visitor came from, and which subpages a visitor views). The resulting information is mainly used for advertising.
- 12.3 Google Analytics uses its own cookies. The information from Google's cookies may be transmitted to other countries and other parties who work with Google. You can set your browser to alert you to Google's cookies and choose whether to accept or reject them. You may still use our websites if you choose not to accept Google's cookies and even if accepted you can delete Google's cookies at any time. If you do not accept or delete Google's cookies, you may be unable to complete orders or use part of our website.
- 12.4 You may prevent Google Analytics from collecting data (like your IP address) by installing the browser plug-in available here: https://tools.google.com/dlpage/gaoptout?hl=en. You can also change your Google ads settings here: https://adssettings.google.com.

13 Links to Other Sites

- 13.1 This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these respective websites.
- 13.2 We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

14 Children's Privacy

- 14.1 Vision Freedom Academy is a business-based software, as such no person under the age of 13 is permitted to use the Services or sign up to the Vision Freedom Academy platform.
- 14.2 These Services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from children under 13 years of age. In the case that we discover a child under 13 has provided us with personal information, we immediately delete this from our servers.
- 14.3 If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to take necessary actions to rectify the situation.