

KINSHIP COLLECTIVE PTY LTD

ABN: 36 697 096 512

14 Seahaze Drive, Torquay VIC 3228

www.kinshipcollective.com.au

PRIVACY POLICY

Last updated: April 2026

1. Introduction

Kinship Collective Pty Ltd ("we", "us", "our") is committed to protecting the privacy and personal information of our clients, their families, and anyone who interacts with our business. We provide social companionship services for seniors in the Surf Coast region of Victoria, Australia.

This Privacy Policy explains how we collect, use, store, disclose and protect your personal information in accordance with the Australian Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). By engaging our services or visiting our website, you acknowledge that you have read and understood this policy.

We are a non-clinical service. We do not provide medical, nursing, personal care, allied health or NDIS-funded supports, and we do not collect or store health information about our clients.

2. Who We Are

Kinship Collective Pty Ltd is a Victorian proprietary limited company operated by Saskia and Raphael. We offer personalised, one-on-one social companionship for seniors, including companionship visits, accompanied walks, social outings, assistance with non-personal daily tasks such as grocery shopping, and transport to appointments or leisure activities across the Surf Coast and surrounding areas.

Our contact details, including direct mobile numbers for Saskia and Raphael, are published on our website at www.kinshipcollective.com.au. Full contact details are also set out in Section 11 of this policy.

3. Information We Collect

Because we provide a non-clinical companionship service only, the personal information we collect is limited to what is reasonably necessary to schedule visits, communicate with you, ensure your safety during outings, and manage our business. We do not collect medical, clinical or health information.

3.1 Personal Identification and Contact Information

- Full name
- Residential address (so we know where to meet you)
- Phone number(s) and email address
- Date of birth (where required to confirm identity, such as for service eligibility)
- Name and contact details of one or more emergency contacts

3.2 Service-Related Information

- Details of services requested or provided
- Scheduling and appointment records
- General notes on your preferences, interests, and routines (for example, that you enjoy a particular café or like to be home before sunset)
- Any access requirements or safety considerations you choose to share with us, recorded only at your request
- Feedback or complaints

3.3 Billing Information

- Billing address and invoicing details
- Payment records

We do not store credit card or bank account numbers ourselves. Where you pay by card or bank transfer, that information is handled directly by your bank or by our payment processor.

3.4 Website and Digital Information

- Information you submit through our website contact form
- Standard server log information collected by our website host (such as IP address, browser type, device information and pages visited)
- Anonymised website usage data collected through cookies and analytics tools

Our website is hosted by Cloudflare. We use Google Workspace for email. These are the only digital platforms used to operate our business.

4. How We Collect Your Information

We collect personal information:

- Directly from you, or from a person you have authorised to act on your behalf, during initial enquiries, phone calls, emails or in-person meetings
- From referral sources such as family members, with your knowledge
- Through our website when you submit a contact form

Where it is practicable to do so, you may deal with us anonymously or by using a pseudonym (for example, when making a general enquiry through our website). Once you become a client, we need to know who we are spending time with for safety and scheduling reasons, so anonymous engagement is not possible for ongoing services.

5. Why We Collect Your Information

We collect and use your personal information to:

- Provide safe, personalised companionship services tailored to your preferences
- Communicate with you about appointments, scheduling and service changes
- Manage billing, invoicing and financial administration
- Comply with our legal and regulatory obligations, including workplace health and safety
- Maintain accurate records for quality and continuous improvement
- Respond to enquiries, feedback or complaints
- Protect the safety and wellbeing of our clients and our team

We do not send marketing emails, SMS or other electronic direct marketing. Our marketing is limited to general newspaper advertisements and printed flyers, which do not use your personal information.

6. Disclosure of Your Information

We will not sell, rent or trade your personal information. We may share limited information in the following circumstances:

- With your nominated emergency contacts or family members where this is necessary for your safety, or where you have asked us to keep them informed
- With our professional advisors, such as our accountant or legal counsel, who are bound by confidentiality obligations
- With third-party service providers that operate the digital tools we use to run the business (currently Cloudflare for website hosting and Google Workspace for email), who are required to protect your information
- Where required or authorised by law, including in response to a court order, subpoena or regulatory request

We do not use client photographs or stories for marketing, on social media, or on our website. Photographs of clients will only be taken at your express request and only for the purpose you specify (for example, a memento of an outing), and will be retained on your client record only.

6.1 Overseas Disclosure

Two of the platforms we use to run the business are operated by overseas providers:

- Cloudflare – website hosting and content delivery (United States, with global infrastructure)
- Google Workspace – email and document storage (United States, with data centres including in Australia)

Both providers are large, established platforms with publicly available privacy and security commitments. Before sending any information overseas through these platforms, we take reasonable steps to ensure they handle your information consistently with the Australian Privacy Principles.

7. Storage and Security of Your Information

We take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Our security measures include:

- Storing electronic records in our Google Workspace account, which is protected by strong passwords and multi-factor authentication
- Limiting access to client information to Saskia and Raphael only
- Storing any physical records in a locked, secure location at our business address
- Securely destroying paper records that are no longer needed (for example, by shredding)
- Reviewing our data security practices periodically

7.1 Data Breaches

If we become aware of a data breach involving your personal information that is likely to result in serious harm to you, we will assess the breach in line with the Notifiable Data Breaches scheme under Part IIIIC of the Privacy Act and, where required, notify you and the Office of the Australian Information Commissioner (OAIC).

8. Retention of Your Information

We retain personal information only for as long as it is needed for the purposes described in this policy, or as required by law. When information is no longer needed, we will take reasonable steps to securely destroy or de-identify it.

As a general guide, client records are retained for a minimum of seven (7) years after the last service provided. This is consistent with the record-keeping period required for taxation and business records under Australian law.

9. Your Rights

Under the Australian Privacy Principles, you have the right to:

- Access the personal information we hold about you
- Request that we correct any inaccurate, incomplete or out-of-date information

- Withdraw your consent to us holding your information at any time, noting that this may mean we are no longer able to provide services to you
- Lodge a complaint if you believe your privacy has been breached

To exercise any of these rights, please contact us using the details in Section 11. We will respond to your request within 30 days. Before releasing personal information, we will take reasonable steps to verify your identity. There is no fee for making a request, although we may charge a reasonable cost-recovery fee in the unusual event that responding to a request involves substantial work.

10. Cookies and Website Analytics

Our website at www.kinshipcollective.com.au may use cookies and basic website analytics to understand how visitors use the site and to keep the site secure. Cookies are small data files stored on your device. You can manage or disable cookies through your browser settings; please note that disabling cookies may affect some functionality of the website.

We do not use cookies to collect personally identifiable information about you unless you voluntarily provide it (for example, by submitting a contact form). We do not use cookies for advertising or behavioural tracking.

11. How to Contact Us

If you have any questions about this Privacy Policy, wish to access or correct your personal information, or would like to make a complaint, please contact us. Saskia and Raphael are jointly responsible for handling privacy enquiries for Kinship Collective Pty Ltd.

Kinship Collective Pty Ltd

14 Seahaze Drive, Torquay VIC 3228

Email: admin@kinshipcollective.com.au

Website: www.kinshipcollective.com.au (mobile contact numbers for Saskia and Raphael are published on the website)

12. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. Any updated version will be posted on our website with a revised date. Where changes are significant, we will make reasonable efforts to notify current clients directly.

13. Complaints

If you are not satisfied with our response to a privacy concern, you have the right to lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

Office of the Australian Information Commissioner

Website: www.oaic.gov.au

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Post: GPO Box 5218, Sydney NSW 2001

Thank you for trusting Kinship Collective with your time.