

Life Nav Privacy Policy

Life Nav Pty Ltd (ABN 97 671 968 193) (both together as “We” and “Life Nav”) are committed to protecting and respecting your privacy. This Privacy Policy (“Policy”) (together with our Terms and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us and how you can get access to this information. If in doubt, the primary governing law of this policy is that of the state of Victoria, Australia.

1. Purpose of this Policy

Life Nav provides you (the “User”) with access to the online and mobile services associated with Life Nav, including but not limited to: www.lifenav.com.au and all associated subdomains (the “Website”), and the Life Nav mobile applications (the “App”), collectively the “System”.

Our privacy policy is written to be compliant with numerous national and international laws and frameworks, including but not limited to [GDPR](#).

2. Processing your data

What is the purpose of our processing?

We process your data in order to provide a program of personalised tools for navigating situations that are mentally challenging (and to support the delivery of that program).

What is our legal basis for processing?

We require consent from all users before processing their data. This consent can be withdrawn at any time. To request deletion of data, please send an email to admin.a@lifenav.com.au from the email associated with the data you wish to delete.

What data do we collect?

Personal information

We collect and use information like your name, email address, and phone number to personalise the course and communicate with the you. You're able to opt out of any external communications (i.e., email, push notifications, and SMS message) at any time.

Health information

We collect information about your mental and physical challenges to personalise our program without sharing your Personal Information.

We may collect information about pre-existing medical conditions in order to ensure the safety of the program we provide.

We also collect general information about your mental and physical wellbeing in order to evaluate the progress of your program.

Electronic identifiers

We may collect information about the devices you use to access the System, including but not limited to: IP address, mobile device UDID and IMEI numbers, operating system, browser type, and screen size. This information is used to provide you with customer support, for system

administration, to tailor your experience of the System, to report aggregate information internally, and to assist communication (e.g., push notifications).

Cookies

We may store cookies (small text files managed by your web browser) on your computer in order to improve your experience with the System. Example uses of these cookies include recognising you when you return to the System, maintaining data you've entered across multiple sessions, and storing information about your personal preferences.

You may refuse to accept cookies by changing the settings on your device to prevent cookies from being set. However, if you select this setting, you may be unable to access certain parts of the System. Unless you have adjusted your browser setting so that it will refuse cookies, our system may issue cookies when you visit the System.

Non-identifiable information

Non-identifiable information means any information that does not reveal Your specific identity either directly or indirectly.

We may include your data in aggregated data sets shared with our research partners. In these sets, your data is not personally identifiable and would be used for supporting generalised statements (e.g., "Sports people that don't get selected for sports teams have a higher probability of poor mental health outcomes"). If you'd like to opt out, please email admin.a@lifonav.com.au

Usage Data

Information collected automatically through Life Nav (or third-party services employed in Life Nav), which can include: behavioural data, the IP addresses or domain names of the computers utilised by the Users who use Life Nav, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

3. Who has access to that data?

Life Nav understands that your identifiable information is private and personal and is dedicated to maintaining its confidentiality and integrity. As such, we will never sell or rent it, and we have policies, procedures, and other safeguards to help protect it from improper use and disclosure.

The following categories describe the ways in which we use your identifiable health information and the rare instances that require us to disclose it to persons and/or entities. We have not listed every use or disclosure within the categories below, but all permitted uses and disclosures will fall within one of the following categories. In addition, there are some uses and disclosures that may require your specific authorisation.

Life Nav does not disclose Personal Information to third parties for any purpose materially different from the purpose(s) for which it was originally collected.

Disclosure at your request

We may disclose information relating to your use of the System when requested by you. This disclosure at your request may require written authorisation by you.

Payment

We do not store credit card or customer details with any 3rd parties except trusted suppliers who help us deliver the services associated with the System and we are committed to ensuring that all suppliers meet our security and data protection standards.

Services and Operations

We may use and disclose your identifiable information in connection with providing services, for our internal operations, which include administration, eligibility, planning, analytics and various activities that assess and improve the quality and cost effectiveness of the service that we deliver to you. Examples are using information about you to improve quality of the service, satisfaction surveys, de-identifying health information, customer services and internal training.

Sharing information with the Organiser and other parties

If you accept the Organiser's nomination to take part in the program, you will be considered a Participant.

To the extent that a Participant accesses our Website and App through a family member, your school, employer, or other organisation ("the Organiser"), our services may include supporting and sharing de-identified information with the Organiser. You consent that the information shared may include participation data (e.g., the fact that you used the Life Nav app), milestone data (e.g., the number of checkpoints you have completed), or support data (e.g., whether you are being supported by trusted others).

Information that identifies a Participant as an individual will not be shared with the Organiser.

If you are a Participant, in addition to any provisions regarding the sharing of information under this Privacy Policy, you consent to sharing personal information with the individuals you appoint as Trusted Others, including but not limited to: answers to questions, to the extent necessary for their collaboration with the program.

If you have been appointed as a Trusted Other, in addition to any provisions regarding the sharing of information under this Privacy Policy, you consent to sharing de-identified responses, including but not limited to; answers to questions, with the Participant and/or Organiser, to the extent necessary for the Participant to benefit from your collaboration.

Emails

We may receive a confirmation when you open an email from us, or click on a link in an email, if your computer supports this type of program. We use this confirmation to help us make emails more interesting and helpful. When you receive an email from us, you can opt out of receiving further emails by following the included instructions to unsubscribe. However, by opting out of further email communications after you sign up, you may limit program reminders and other valuable program content and components.

Reminders and notifications

We may use and disclose your identifiable information to contact you as a reminder to interact with, or complete tasks relating to your use of the System.

Third party service providers

There are some services provided in our organisation through third party services providers. Examples of third-party services providers include server hosting and email delivery providers. We may disclose your identifiable information to our third-party services providers so that they can perform the job that is required of them. To protect your identifiable health information, we require appropriate contracts or written agreements be in place that safeguard your identifiable health information.

Third party medical professionals

With your explicit permission, we may share your identifiable health information with third party medical professionals nominated by you.

Threat to health or safety

We may use and disclose your identifiable health information when necessary to prevent a serious threat to your health and safety, or the health and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.

As required by law

Certain laws permit or require certain uses and disclosures of identifiable health information for example, for public health activities, health oversight activities and law enforcement. In these instances, Life Nav will only use or disclose your identifiable health information to the extent the law requires.

Personal representatives or persons involved with your care

We must use and disclose your identifiable health information to anyone who has the legal right to act for you (your personal representative) in order to administer your rights. We may also use or disclose your identifiable health information to a person involved in your care or who helps pay for your care, such as a family member, when you are incapacitated or in an emergency, or when you agree or fail to object when given the opportunity. If you are unavailable or unable to object, we will use our best judgment to decide if the disclosure is in your best interests. Special rules apply regarding when we may disclose health information to family members and others involved in a deceased individual's care. We may disclose health information to any persons involved, prior to the death, in the care or payment for care of a deceased individual, unless we are aware that doing so would be inconsistent with a preference previously expressed by the deceased.

For research and publicity purposes

We may use de-identifying health information for internal and external research and publicity purposes. This may include publishing aggregate information about our users (for example, that sports people that don't get selected for sports teams have a higher probability of poor mental health outcomes) in the context of providing public health information and conducting academic research. In certain instances, we may only provide such information with special waivers and permissions from you. You can opt out by emailing us at admin.a@lifenav.com.au.

Analytics

Third-party services may be used to monitor and analyse web traffic to keep track of user behaviour.

Transfer of business assets

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. If Life Nav or substantially all of its assets are acquired by a third party, personal data held by it about its customers will be one of the transferred assets. Life Nav will ensure that information transferred to third parties will only be used in a way that is compliant with our privacy principles and will remain liable in cases of onward transfers to third parties.

4. How do we store your data?

We store all your personal information on secure servers. In some cases, to ensure a fast user experience, we may store some data on your device.

Where you have chosen a password that enables you to access certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share the password with anyone.

We do not store any credit or debit card information. Payments are processed via a third-party payment provider. Any payment transactions are encrypted using SSL technology.

Once we have received your information from the app or website, we will use strict procedures and security features to try to prevent unauthorised access. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. Information you provide to us is stored in encrypted form on secure servers.

We may process some of your data with third parties to use their software platforms who have servers outside Australia to send communication emails to our users, but always in accordance with data protection law and subject to strict safeguards.

5. Your rights

Users of the System have certain specific rights with regard to their information.

Right to access

A user of the System has the right to view personal information that Life Nav has collected about them, as well as the disclosure of this data. In order to receive this data, please email admin.a@lifonav.com.au. The first copy of this information is provided free of charge, and in a portable / common electronic form (e.g., CSV file).

Right to accuracy

A user of the System has the right to ensure that the data we have stored is accurate. In most cases, the system allows you to directly modify your own information. However, if there is incorrect data within our system that you are not able to change, please email admin.a@lifonav.com.au and we will work directly with you to update this information.

Right to deletion

Subject to any exemptions provided by law, a user of the System has the right to request deletion of all data within the system. To request your data be deleted, please email admin.a@lifonav.com.au. In most cases, this request will be completed within 30 days. If

circumstances require a delay to this deletion, Life Nav will notify you directly explaining the reason for the delay. Note also that in some cases, there may be a legal requirement to hold on to your data. Again, Life Nav will notify you directly if this is the case.

Right to withdraw consent

A user of the System has the right to withdraw their consent at any time by emailing admin.a@lifonav.com.au. Please note that without consent to process your data, we will be unable to deliver the Life Nav program.

Right to notification of disclosure

In addition to the right to request disclosures of your data specified in the "right to access" above, we will notify you as required by law if there has been a breach of the security of your identifiable information.

Concerns or complaints

If you believe that any of your rights with respect to your or others' identifiable health information have been violated by us, our employees or agents, please email admin.a@lifonav.com.au.

6. Amending this Policy

We reserve the right to revise this Policy without notification. Any changes or updates will be effective immediately upon posting to <https://www.lifonav.com/privacy-policy>. Your continued use of the System constitutes your agreement to abide by the Privacy Policy as changed. Under certain circumstances (for example, if we expand the ways in which we use your personal information beyond the uses stated in our Privacy Policy at the time of collection), we may also elect to notify you of changes or updates to our Privacy Policy by additional means, such as by sending you an email.

For inquiries regarding revisions to this policy, please contact admin.a@lifonav.com.au.

7. Who can you contact?

Barton Cowie
admin.a@lifonav.com.au