



The Endeavour Clinic Privacy Policy

Australian College of Natural Medicine Pty Ltd (ABN 57 061 868 264) trading as **Endeavour College of Natural Health (College)** is a natural health education institute, training its students to provide natural health services. We also operate (and trade under the name) **Endeavour Clinic**, the purpose of which is to provide a work-integrated learning environment for our students, in which they can interact with clients and gain experience in assessing and treating a range of conditions. In this privacy policy, the College and Endeavour Clinic are referred to as **(we, us, our)**.

We are bound by the Australia Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). We understand the importance of, and are committed to, protecting your personal information. This Privacy Policy explains how we manage your personal information (that is, information or an opinion, whether true or not, about an individual who is identified or is reasonably identifiable), including our obligations and your rights in respect of our dealings with your personal information, in relation to the operation of Endeavour Clinic. Please take a moment to read our Privacy Policy as it describes what happens to your personal information that is collected in the course of our business in relation to the operation of Endeavour Clinic.

If you are a student, you can find a copy of the privacy policy that describes what happens to your personal information that is collected in the course of our business in relation to your studies (including if you work in the Endeavour Clinic as part of your studies) on our website at <https://www.endeavour.edu.au/current-students/policies-and-procedures/>.

If you are a member of staff at Endeavour Clinic, further information about the personal information that is collected in the course of your employment or engagement is on our website at <https://www.endeavour.edu.au/current-students/policies-and-procedures/>.

Our website is not aimed at people under 18. We only provide services or product to people who are under 18, where there is a completed 'consent for treatment of a mature minor' form and their parent or guardian is present. Please see our policies and procedures for more information in this regard. Where information about people under 18 is provided to us, it will be handled in accordance with this policy.

Given the nature of our operations, we are unlikely to be able to provide you with the requested services or related products (or otherwise deal with you) where you choose to deal with us anonymously or using a pseudonym. If you do not provide us with truthful or accurate information, this will impact our ability to provide you with services or products.

1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- (a) when you request that we provide you with services or products;
- (b) in connection with any appointment for health services with us, including before (including during a pre-registration electronic or physical form), during and after that appointment;
- (c) if you register for and use an online account with Endeavour Clinic;
- (d) when you make an inquiry through our website, or otherwise correspond with us or contact us;

- (e) through any mobile applications provided by our organisation;
- (f) if you submit a form to sign up to our mailing list;
- (g) when you engage with our staff at any of our premises, over the phone or online;
- (h) if you enter any competitions that we conduct (including on social media);
- (i) if you attend or otherwise participate in any events that we stage;
- (j) while conducting customer satisfaction and market research surveys;
- (k) if you apply for a job at Endeavour Clinic (including if you are a senior student of the College);
- (l) if you are an existing supplier to us or you are seeking to be a supplier to us; and
- (m) where we otherwise deal with you in the course of our business.

However, in certain cases we may collect personal information from others. This includes:

- (a) from a parent, guardian, family member or other support person who assists you in requesting or receiving our services or products; and
- (b) publicly available sources and third parties, such as suppliers, providers of third-party booking platforms, contractors, our clients and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

2. Types of personal information we collect

The type of personal information we may collect can include (but is not limited to), your name, postal address, email address, phone numbers, educational background, billing information and, if applicable, employment or course enrolment information.

We may also collect and hold sensitive information about you, including:

- (a) in the case of an Endeavour Clinic client:
 - (i) health information including information in relation to any existing disability and/or mental health condition;
 - (ii) racial or ethnic origin;
 - (iii) sexual orientation; and
 - (iv) genetic information.

We only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act.

3. Our purposes for handling your personal information

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information:

- (a) to offer and provide you with our services and products;
- (b) to communicate with you and for other purposes related to your consultation (including to make bookings, to provide you with follow-up results or to make referrals to other practitioners);
- (c) to manage and administer those services and products, including account keeping procedures;
- (d) to make continuous improvements in relation to those services and products;
- (e) for purposes related to the training functions of the College, including for discussion, training, research and examination purposes (provided that you will not be reasonably identifiable in any externally published research or report without your consent);
- (f) to comply with our legal and regulatory obligations, including any disclosures that we are required to make to the Department of Human Affairs, Department of Education, Australian Council for Private Education and Training, Council of Private Higher Education Providers, Quality Indicators for Learning and Teaching team, National Centre for Vocational Education Research Ltd, Tuition Assurance Scheme and ESOS Assurance Fund Manager and state and national regulatory bodies (VETAB, DETE, TERC, VRQA, Board of Studies, TEQSA and ASQA);
- (g) for other purposes described in the College's privacy policy which is available on the College's website at <https://www.endeavourclinic.com.au/patient-privacy>;
- (h) for other purposes permitted by law; and
- (i) to otherwise operate and manage our business.

We may disclose personal information to third parties including between members of our corporate group or to:

- (a) third parties who are providing you with related services and products (such as other medical practitioners or our product fulfilment partners);
- (b) training and research partners Endeavour Clinic collaborates with;



- (c) someone who is responsible for you (such as your carer or guardian or to a translator who is present with you at the time of the disclosure); or
- (d) other third parties such as our suppliers, organisations that provide us with technical and support services, or our professional advisors, where permitted by the Privacy Act.

If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do and otherwise impose obligations on them as required by law.

We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure, or the relevant use or disclosure is otherwise permitted by the APPs or some other law.

4. Protection of personal information

We will hold personal information as secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas including in New Zealand.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities to reduce the risk of loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

5. Retention and destruction of records

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

To the extent the personal information we hold about you is a health record, we are generally required to retain that information:

- (a) if you were under the age of 18 at the time the information was collected, until you are 25 years old; and
- (b) if you were over the age of 18 when the information was collected, for a period of 7 years.

However, if we suspect that any of these records may be subject to legal proceedings, we may continue to hold these records for longer.

6. Direct marketing

Like most businesses, marketing is important to our continued success. We therefore like to stay in touch with clients and let them know about new opportunities that might be of interest.

Provided that you have not unsubscribed or otherwise opted out, we may use your information for direct marketing:

- (a) where you have agreed to receive direct marketing from us; or
- (b) where you have engaged with us directly, and we believe that you would reasonably expect to receive direct marketing from us.

We may utilise the services of third parties to assist us with undertaking our direct marketing activities (including the marketing activities of our corporate group). We will not otherwise disclose your personal information to third parties for marketing purposes without your consent.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer whose details are set out in section 10 or by following the options to 'unsubscribe' set out in a marketing email or other electronic message from us.

Note that if you opt-out of direct marketing messages from us, we may still communicate with you from time to time for other purposes, including where we:

- (a) respond to any correspondence you send us;
- (b) communicate with you in relation to appointments or otherwise in respect of any services or products that are, or have been, provided to you;
- (c) engage with our contractors and suppliers; or
- (d) are legally required to provide you with notice of certain matters.

7. Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the website. This information will help to better adapt the website to suit personal requirements. For information on cookie settings of your internet browser, please refer to your browser's manual.

8. Accessing and correcting your personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. The request must be made in writing, and an identity check may be carried out to ensure your identity matches with the personal information requested. On the rare occasions that we refuse access, we will provide you with a written notice stating our reasons for refusing access and the mechanisms available to dispute the refusal. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.



We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing and the mechanisms available to dispute the refusal.

We will respond to all requests for access to or correction of personal information within a reasonable time, but no later than 28 days from the date of the request.

9. Overseas transfers of personal information

We may disclose personal information between its related bodies corporate, where permitted under the Privacy Act. We currently operate out of offices in New Zealand. We therefore may disclose personal information to our associated entities in New Zealand.

As at the date of this Privacy Policy, we are not likely to disclose personal information to other overseas recipients. If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise you of the countries in which any overseas recipients are likely to be located by updating this privacy policy.

Before we disclose your personal information to overseas recipients, we will comply with our obligations under the APPs and otherwise at law.

10. Resolving personal information concerns and contacting our Privacy Officer

If you have any questions, concerns or complaints about this Privacy Policy or how we handle your personal information please contact our Privacy Officer.

The Privacy Officer
Endeavour College of Natural Health
Level G, 230 Brunswick Street
Fortitude Valley Queensland 4006
Telephone: 07 5634 8485
Facsimile: 07 5503 0988
Email: privacy@endeavour.edu.au

We take all complaints seriously, and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
GPO Box 5288
Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

11. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our website at <https://www.endeavourclinic.com.au/>

The last update to this document was 13.February 2025.