

BRIGHT HORIZONS PRIVACY

Bright Horizons Australia ("Bright Horizons", "we", "us" and "our") is committed to protecting your privacy.

This privacy policy identifies how Bright Horizons collects, holds, uses and discloses personal information in accordance with the *Privacy Act 1998* (Cth) as amended (including the Australian Privacy Principles) (**Privacy Act**). It also sets out how, if we hold your personal information, you may access and seek correction of your data or register a complaint about how we have collected, used or disclosed your information.

If you are the parent, guardian or carer of a child registered with Bright Horizons services, then references to "your" personal information or privacy in this privacy policy should be taken to include references to your child's, or children's, personal information or privacy (as appropriate).

We may change our privacy policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current privacy policy.

PURPOSE

Bright Horizons collects and holds personal information about parents and carers, children, and other users of our services including stakeholders for the primary purposes of providing high quality education, care and health services. We do things a little bit differently by taking the time to offer a holistic approach to high quality education centred not just on learning, but also the overall health and wellbeing of those in our care.

We expect the particular purpose for which your personal information is collected will be clear at the point and time it is obtained, but the reasons for collection and use of personal information may include: providing early childhood education, in-centre care, in-home care, health, medical and care services; documenting children's development, experiences and learning; managing care recipients current or prospective registration; for administrative and billing purposes; employment and related purposes; and providing you with information about our organisation, services and activities.

You always have the right to opt-out of receiving information about our organisation, services and activities. You may exercise that right by contacting our Privacy Officer, whose details are set out at the end of this policy.

Bright Horizons will only use personal information:

- ✓ for the purpose it was collected;
- ✓ for a purpose related to those described above which would reasonably be expected by you;
- ✓ for a purpose for which you give your consent; or
- ✓ as otherwise permitted by law (including for law enforcement or public health and safety reasons).

PERSONAL INFORMATION AND SENSITIVE INFORMATION WE MAY COLLECT AND HOLD

Parents and carers

If you are a parent, guardian or carer of a child registering for (or using Bright Horizons services, we may collect the following personal information about you: name, gender, address, phone numbers, email address, date of birth, photographic identification documents and other information relevant to providing you with care and related services.

Additional or Emergency Contacts

If you are a person listed as an Additional Contact for a care recipient registering Bright Horizons services, we may collect the following personal information about you: name, address, phone number; email address and photographic identification documents.

Children

We collect the following personal information about a child or children registering with or using our services: name, gender, address, date and care arrangements including custody agreements or parenting orders, dietary requirements, languages spoken, physical and social developmental information, any additional or special needs, photographs and videos of children and general material about your child and your family that assists us in providing high quality, personalised learning and care services. This personal information may be collected during the registration process and/or on an on-going basis while children are in Bright Horizons' care.

We also collect certain sensitive information about children registering for our services. The sensitive information we collect about a child or children enrolling with or using our services includes: immunisation status, specific religious or cultural requirements, medical conditions and details of medical care needs.

METHODS OF COLLECTION

Personal information

We will collect your personal information directly from you, unless it is unreasonable or impractical to do so. Where practicable, we will notify you that we will collect or have collected your personal information at the time of or as soon as practicable after collection.

Some of the ways in which we may collect your personal information, include: in our standard forms, through our website, via email or mobile apps, over the phone, in direct conversation with you, through a third person (such as a parent or guardian) or from your employer. Photos and videos of children may also be collected and used with the specific consent of families and/or carers. These photos and videos are usually collected using cameras or tablets.

If you visit our website, we may collect certain technical details about your computer and web browser (such as your IP address) and, like many, we use cookies and analytical technologies to track and enhance your online experiences and for the purpose of direct marketing. Cookies and similar tools do not access your personal information, or enable you to be identified as an individual, and you can choose to reject them by changing your browser settings, however this may prevent you taking full advantage of our on-line functionality.

Generally, if you choose not to provide certain personal information, we may not be able to process your application or provide you with the level of service we would like to provide.

Sensitive information

Bright Horizons acknowledges that some of the information we collect is sensitive personal information (for example health information or religious affiliations). We collect this information when it is reasonably necessary for delivery of our services and ensuring the well-being, protection and development of those in our care. We may also collect this information when required or authorised under National or State laws relating to the regulation of education, child protection and care services in Australia.

We will notify you when you need to collect your sensitive information. We will only collect your sensitive information with your consent and will ensure that it is stored securely. If you do not wish for your sensitive information to be collected by us, please let us know.

Government related identifiers

Bright Horizons acknowledges that some of the personal information we collect are also 'government related identifiers' within the meaning of the Privacy Act (for example, drivers' licence, birth certificate, and other photographic identification documents). We will not use or disclose a government related identifier unless this is permitted by the Privacy Act (for example, to verify your identity for the purposes of providing our service to you, or where use or disclosure is required or authorised by or under an Australian law).

STORAGE AND SECURITY OF INFORMATION

We take all reasonable steps to protect personal information that we hold from unauthorised access, modification, misuse, loss and disclosure. The information may be stored in paper or electronic format (or both), at our Campuses and/or at our Bright Horizons Support Office and/or in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We may store, process or back-up your personal information on computer servers or storage facilities that are located within Australia and overseas including through third parties who provide services to our business. Bright Horizons has specific systems in place that are designed to maintain a high level of security over information that Bright Horizons holds, particularly around the management of medical records which are kept confidential and only made available to authorised persons.

NOTIFIABLE DATA BREACHES SCHEME

In the event of any loss or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, Bright Horizons will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act.

DISCLOSURE

Bright Horizons will only disclose your personal information for the purpose it was collected or a reasonably expected and related secondary purpose or otherwise with your consent. This may include a disclosure to third parties that provide services to our business and operations and organisations and contractors that assist us with the purposes for which we use your information. When we do, we will take reasonable steps to ensure these service providers do not breach the Australian Privacy Principles. These providers may be based overseas or use overseas infrastructure to perform services for us. For example, we may disclose your information to our service providers in the United States of America, United Kingdom, India, the European Economic Area, Holland, and New Zealand.

Unless you have given us your consent, Bright Horizons will only disclose your sensitive information for the purpose for which the sensitive information was collected, or for a secondary purpose that is directly related to purpose of collection.

We may also be authorised or required by law under certain circumstances to disclose personal information or sensitive information or government related identifiers we hold to child protection and/or family or community services agencies and to health authorities.

ACCESS, CORRECTION AND COMPLAINTS

You may seek access to your personal information by making a request in writing directed to our nominated Privacy Officer using the details set out below. Employees other than the Privacy Officer are not generally able to provide you with access. In some circumstances we may need to decline access to your personal information but will tell you why, if this is the case. Circumstances where access may be denied include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of Bright Horizons' duty of care to another person or their child.

If at any time you believe that our record of your personal information is incorrect, please let us know. We will take reasonable steps to correct any errors or omissions in your information so that it is accurate, complete and up to date.

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you wish to make a complaint about a breach of the Privacy Act in relation to personal information we hold about you, please contact us and we will take reasonable steps to investigate the complaint and respond to you in a timely and efficient manner. If you are not happy with our response, you may complain directly in writing to the Australian Information Commissioner (the regulator responsible for privacy in Australia) as follows:

Email: www.oaic.gov.au

Write to **Director of Compliance**
Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

Phone **1300 363 992**

For more information about privacy in general, you can visit the Australian Information Commissioner's website at www.oaic.gov.au. You may also request a copy of this privacy policy which we will endeavour to provide you within a reasonable timeframe (free of charge).

CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF CHILDREN

Bright Horizons respects every parent's / carers right to make decisions concerning their child's or dependants care.

Generally, Bright Horizons will refer any requests for consent and notices in relation to the personal information of a child or dependant, to the care recipients parent(s), guardian(s) or carer(s).

Bright Horizons will treat consent given by the care recipients parent, guardian or carer as consent given on behalf of the child or adult, and notice to parents / carers will act as notice given to the child/adult care recipient.

BRIGHT HORIZON PRIVACY OFFICER

Bright Horizons Privacy Officer

Postal Address: Level 3, 207A Pacific Highway, St Leonards NSW 2065

Email address: privacy@oac.edu.au

Telephone: 138 (622)

DOCUMENT HISTORY

Bright Horizons may amend this policy from time to time.

Policy #	L 1.8
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Owner	Legal	
Scope	Work + Family Solutions	
Review Date	March 2026	
History	Date	Description of Update
	May 2024	Bright Horizons policy created
	March 2025	Reviewed and updated by Work + Family Solutions and Legal
	May 2025	Reviewed and updated by Work + Family Solutions and Legal