

COREmpower Privacy Policy

Policy No. / Version:	Version 1
Responsible Person:	Christine Thornton
Approved Date:	14 October 2020
Review Date:	

1. COREmpower, trading under the name Core Advanced Technologies Limited UK and Core Advanced Technologies Pty Ltd Australia, is an online mental health coaching and support platform and a tool for mental health researchers.
2. By accessing COREmpower services you indicate your agreement to the use of your data as outlined in this policy and to be bound by our Terms of Use.
3. COREmpower respects the privacy of individuals and is committed to protecting the confidentiality, security and privacy of information held in its records. COREmpower undertakes to comply, to the extent possible and where relevant, with:
 - a. the Privacy Act 1988 (Cth), Australia;
 - b. The General Data Protection Regulation 2016/679, EU; and
 - c. The 1974 Privacy Act, USA.
4. This Privacy Policy (the Policy) sets out how COREmpower manages your personal information. It details how your information is collected, used and disclosed by us, including:
 - a. On the COREmpower Website; and
 - b. On the COREmpower Blogs (the Blogs) and Forums (the Forums).
5. Our platform is provided in partnership with mental health and wellbeing professionals around the world. As such, they are bound by professional obligations of confidentiality in their local jurisdiction. While we undertake to vet the services we link to, we cannot guarantee, and accept no liability for, legal breaches of any kind, or losses incurred by such breaches; by third party websites or service providers.

Collection of Information

6. COREmpower, for the purpose of administering services and furthering mental health research, collects three types of information:
 - a. Personal Information;
 - b. Information which identifies you, or could reasonably identify you;
 - c. Sensitive information;
 - d. Information which is privileged or proprietary (i.e. medical history); and
 - e. General Information;
 - f. Any other information generated by your interaction with our platform.
7. Your personal information is stored electronically and encrypted separately from the rest of your information, to ensure maximum security and privacy.
8. COREmpower will generally collect information volunteered by you when you interact with us, including by:
 - a. Signing up for an account;
 - b. Completing questionnaires or using other assessment tools;
 - c. Emailing, messaging or otherwise engaging with us via our website services.
9. The quality of services provided on our platform is dependent on the quality of the information you provide to us. While it is up to you to determine the accuracy of information voluntarily provided to us, we will make reasonable efforts to facilitate the legitimate use of our platform to those who wish to mask their identity, subject to the following exceptions:
 - a. You must provide a current and accurate emergency contact;
 - b. You must provide the basic information required for our platform to function.
10. COREmpower does not accept liability of any kind of loss or damage incurred as a result of the information volunteered by you.

Storage of Information

11. The COREmpower website is hosted by servers located in the UK. We maintain the security of your information by:
 - a. Encrypting and storing your identifying information separate from your other information;
 - b. Using Secure Socket Layer (SSL) software protected by encryption and firewall technology;
 - c. Storing your information in our password-protected computer systems within access-controlled premises; and
 - d. Only providing access to authorised people in particular circumstances for particular reasons.
12. We take all reasonable steps to secure your information. To assist us with this, you remain responsible for:
 - a. Ensuring you sign out or close your browser once you have finished using our platform;
 - b. Securing access to your digital devices which access your COREmpower account; and
 - c. We accept no liability for any damage or loss incurred through your failure to secure such access either to your account or your digital device.

Use of Information

13. The information provided by you is used to develop your COREmpower profile. The purpose of such a profile is to:
 - a. Provide you with a means of tracking your mental well-being journey as you explore the range of tools available on our platform;
 - b. Provide third-party service providers with comprehensive information to accelerate the effectiveness of the service they provide; and
 - c. Provide data to mental health research professionals to further innovations in mental health and well-being treatments.

14. We may disclose particular information where necessary, if:
 - a. It is required by law; or
 - b. We reasonably believe disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety; and
 - c. We will only disclose the information reasonably necessary for such a purpose.
15. Your information will not be sold to third parties for the purpose of direct or indirect marketing of goods and services to you.
16. Your de-identified data may be disclosed for research, or for the compilation or analysis of statistics, relevant to public health or safety, with our research partners.
17. Where you choose to engage a third-party service through our platform, your profile information may be shared to inform the services they provide. In such a case, we will:
 - a. Ask your permission to share your profile every time; and
 - b. Allow you the option of engaging services without providing your profile;
 - c. If you choose not to share your profile, the service provider may require you to provide additional information subject to their own requirements.
18. Personal information no longer required by COREmpower for any of the purposes contemplated by this Policy will be destroyed or permanently deleted.

Changes to Policy

19. COREmpower may amend this Policy at any time by posting a notice about the updated terms on the COREmpower website. By accessing our platform after the notice has been posted, you indicate your agreement to the terms of the updated policy.

Enquiries and Complaints

20. You may contact our Privacy Officer to:
 - a. Obtain a copy of the current Privacy Policy;

- b. Request we correct information held by us about you;
- c. Request access to the information we hold about you;
- d. Request we delete your personal information;
- e. Make any other enquiries about the information we hold about you; or
- f. Make a complaint about our use of your information.

21. Our Privacy Officer may be contacted at:

christine.t@corempower.com

22. If we cannot resolve your complaint about our use of your information, you can contact your local information oversight authority:

United Kingdom	European Data Protection Board
USA	Office of Civil Rights
Australia	Office of the Australian Information Commissioner

COREmpower Privacy Officer

Christine Thornton
christine.t@corempower.com

Policy Authorisation

Christine Thornton
Chief Executive Officer
COREmpower
14 October 2020