

**This policy comes into effect on 22 August 2024.**

# Privacy Policy

## 1. Purpose of this Policy

1.1 The purpose of this Privacy Policy is to let you know what kind of information Mable Technologies Pty Ltd (ACN 162 890 379) and our Related Bodies Corporate (“Mable”, “we”, “us” and “our”) may gather about you when you visit this Site or Platform, or register to become a Member, and to inform you how we comply with the requirements of the Privacy Act 1998 (Cth) including the Australian Privacy Principles. Please note that as some of our Related Bodies Corporate may have different functions or specific legal requirements, they may have separate privacy policies (in which case, this Privacy Policy will not apply to those entities). You should check each time you interact with any of our companies which policy is applicable.

1.2 This Privacy Policy also explains:

- a. how Mable collects and holds Personal Information;
- b. the purposes for which we collect and hold Personal Information;
- c. how we may use that Personal Information, and to whom we may disclose it;
- d. our disclosures of Personal Information to entities overseas;
- e. how you can gain access to your Personal Information and seek its correction;
- f. how you may inquire or make a complaint about our collection, handling, use or disclosure of your Personal Information; and
- g. how that inquiry or complaint will be handled.

1.3 “Personal Information” is, broadly speaking, any information or opinion about a person, or otherwise relating to a person, where that person is identified or could reasonably be identified. “Sensitive information” is a special subset of Personal Information, and includes information about a person’s physical and mental health (including any injuries or disabilities they may have) and other information about things like their racial or ethnic background, religious beliefs, membership of a professional or trade association or a trade union, sexual orientation, and criminal record. In this Policy, references to “Personal Information” include sensitive information.

1.4 Protecting your privacy is very important to Mable. We are committed to maintaining the security of Personal Information provided to Mable by individuals and organisations who use this Site, including by registering themselves or another person to become a Member.

## 2. Definitions

2.1 The following definitions apply in this Privacy Policy:

- a. “Account” means a Member’s account with Mable that enables access to and use of the Platform;
- b. “Affiliates” means Mable’s Related Bodies Corporate, joint ventures, or other companies under a common control;
- c. “Care Services” means the home care, aged care, disability support, health care or other care or associated services the provision of which are arranged through the Platform, and includes any services incidental to those services (including travel);
- d. “Corporations Act” means the *Corporations Act 2001* (Cth), as amended from time to time;
- e. “Member” means a person or organisation who establishes or seeks to establish an Account with Mable;
- f. “Policy” means this Privacy Policy as amended from time to time;
- g. “Privacy Act” means the Privacy Act (Cth) 1988, as amended from time to time;
- h. “Platform” means the online platform provided by Mable to connect Members, including the online platform and smartphone App;

- i. “Related Bodies Corporate” has the meaning defined in the Corporations Act;
- j. “Site” means the mable.com.au website including without limitation all subpages;
- k. “Terms of Use” means the agreement between Mable and each Member which sets out the terms and conditions in respect to the Platform and are located at <https://mable.com.au/legal/>;
- l. “User” means a Member or Visitor; and
- m. “Visitor” means an individual that visits and browses the Site but does not create or seek to create an Account.

2.2 Unless the context provides otherwise, capitalised terms not defined in paragraph 2.1 or elsewhere in this Policy have the meanings given in our relevant Terms of Use located at <https://mable.com.au/legal/>.

### **3. Who does Mable collect Personal Information from?**

3.1 We may collect Personal Information from:

- a. Visitors when they visit our Site; and
- b. Members, which includes Customers and Support Workers as well as other third parties who register as Members (including Approved Providers (or their employees), and case managers and support coordinators, who assist with the management and co-ordination of an individual’s Care Services).

### **4. User consent**

By submitting Personal Information through our Site or Platform (including when you register yourself or another person as a Member), you agree to the terms of this Policy on your own behalf or on behalf of the person whose information you are submitting, and you expressly consent to the collection, use and disclosure of that Personal Information in accordance with this Policy.

### **5. Types of data we collect**

5.1 The information Mable collects about you depends on how and why you access our Site and use our Platform.

5.2 We collect Personal Information and anonymous data, as described below.

- a. Information you provide to us
  - i. If you are a Support Worker, when you create an Account, we will collect Personal Information from you, including but not limited to your first and last name, legal name, birth date, driver’s licence number, other information by which we can identify you or verify your identity (such as passport details), your certification to work with children or with vulnerable people, the results of any applicable screening checks, your criminal history, ethnicity, gender, religion, cultural background, email and mailing address, phone number, work experience, salary/income, professional license numbers, education, interests, hobbies, professional and personal references, profile picture and video, professional skills and abilities, lifestyle information, schedule availability, music preferences and bank information to facilitate direct deposit of earnings.
  - ii. If you are a Customer and you require Care Services yourself, when you create an Account, we will collect Personal Information from you, including but not limited to your first and last name, legal name, birth date, driver’s licence number, other information by which we can identify you or verify your identity (such as passport details), your criminal history, gender, cultural background, email and mailing address, phone number, family or emergency contacts, care services needed, care plan, health conditions, activities, profile picture, interests, music preferences, household information and credit card information to facilitate payment processing.

- iii. If you are a Member other than those described in paragraphs 5.2(a)(i) and 5.2(a)(ii) above, such as a family member, government Approved Provider or other case manager or support coordinator, when you create an Account, we will collect Personal Information from you, similar to the information outlined in paragraphs 5.2(a)(i) and 5.2(a)(ii) above.
- b. Sensitive Information
- i. We may collect sensitive information (including health or genetic information, criminal history, racial or ethnic origin, religious beliefs) from Customers and Support Workers when they choose to provide information about themselves or someone else on whose behalf they are authorised to act, and (in the case of Client) their care requirements, through the Site.
- c. Other ways we may collect Personal Information
- i. We collect and retain information on your behalf, such as files and messages that you store using your Account.
  - ii. If you provide us with feedback or contact us via email or online form, we will collect your name and email address, as well as any other content included in the message, in order to send you a reply or otherwise action your feedback.
  - iii. When you post messages or upload content within our Site or Platform, the information contained in your posting will be stored on our servers, and other Members to whom you provide access will be able to see such messages and content.
  - iv. We also collect other types of Personal Information that you provide to us voluntarily, such as your operating system and version, and other requested information if you contact us via email regarding support for the Platform.
  - v. We may also collect Personal Information at such other points in our Site and during your use of our Platform that state that Personal Information is being collected.
  - vi. Please note that you can choose not to provide us with certain information, but this may limit the features of the Site or Platform you are able to use.
- d. Information collected via technology
- i. To make our Site and Platform more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol (IP) address, domain name, and/or a date/time stamp for your visit.
  - ii. Like many other website operators, we use cookies on our Site. Cookies are very small files which a website uses to identify you when you come back to the site, and which store details about your use of the site. Cookies are not malicious programs that access or damage your computer. We use cookies to improve the experience of Users and enable Members to access secure areas of our Site and Platform. You may choose to disable cookies by adjusting the privacy settings in your browser, but you may not be able to access some parts of our Site or Platform if you do so.
  - iii. We may also use or enable:
    - 1. third party analytics services to track and analyse anonymous data from Users of our Site and Platform; and
    - 2. If, in future, you use the location-enabled services, Mable may receive information about your actual location (such as GPS signals sent by a mobile device or via your web browser when on the Site).
  - iv. Information about you may also be inferred from personal information using machine learning tools
- e. Invitation emails
- i. Members and Visitors to our Site can invite other people to become Mable Members by requesting us to send invitation emails to them.

- ii. When you provide someone else's email address to us for the purposes of sending them an invitation email, you must first obtain the person's consent and ensure they agree to receive an invitation email from us.
  - iii. We store the email addresses that are provided to us and, if they are provided by a Member, we will associate those email addresses with such Member's account.
  - iv. We will only send one invitation and will not use the email address for any other communication unless the person becomes a Member of Mable.
  
- f. Information collected from others about you
  - i. Other Members may provide us with Personal Information about you through our Site or the Platform. Examples include when a Client posts feedback regarding a Support Worker, when a Support Worker uploads notes or other information regarding a Client to our Site, or when another Member (including a Client's Approved Provider or other case manager, coordinator or support coordinator) submits health information or care plan information to us.
  - ii. Other Members or individuals may provide Personal Information about you where you have authorised them to act on your behalf, including creating an Account for you.
  
- g. Information collected from third parties
  - i. We may receive Personal Information and/or anonymous data about you from companies that assist Mable in providing the Platform, such as service providers who assist with identifying you or verifying information provided by you (eg. your police check), or companies that offer their products and/or services on our Site or Platform.
  
- h. Unsolicited Information
  - i. Where we collect unsolicited information (being information provided to us without us having sought the information), we will only hold, use and disclose that information if we could otherwise do so had we collected it by the means described above. If that unsolicited information could not have been collected by the means described above, then we will destroy, permanently delete or de-identify the information as appropriate.

## 6. Use of Personal Information

### 6.1 General use

In general, we use the Personal Information we collect either to provide the Platform or Site to you, to respond to requests that you make, or to aid us in serving you better, including in the following ways:

- a. to facilitate the creation of, and secure, your Account on our network;
- b. to send you a welcome email and to verify ownership of the e-mail address provided when your Account was created;
- c. to identify you as a User in our system;
- d. to prompt you to set up your profile after you have created your Account (if you do not do so at the same time as creating your Account);
- e. to review and verify information provided by you as part of the registration process and to approve you as a Member. This may include running or verifying background checks, including police, identity, reference and other screening checks. In doing so, we may obtain sensitive information, such as police checks about you;
- f. to verify your credentials and identity;
- g. to provide improved administration of our Site and Platform. This may include accounting functions, including management of invoices;
- h. to provide the Platform and other assistance you request;
- i. to improve the quality of experience when you interact with our Site and Platform;

- j. to provide support to Members, including by our customer support team. Calls by the customer support team may be recorded and reviewed in order to assess our support functions;
- k. to tailor the features, performance and support of the Site or Platform to you;
- l. to send you administrative e-mail notifications, such as security or support and maintenance advisories, or to inform you when our Terms of Use or any of our policies (including this Policy) have been updated;
- m. to respond to your inquiries or requests and/or troubleshoot problems;
- n. to make telephone calls to you, from time to time, as a part of secondary fraud protection or to solicit your feedback;
- o. to send newsletters, surveys, offers, and other promotional materials related to our Platform and for other Mable marketing purposes;
- p. to customise the advertising you may see on the Site or through the Platform;
- q. to collect and/or distribute money;
- r. to verify your compliance with your obligations in our Terms of Use or other Mable policies;
- s. for trust and safety purposes such as responding to or addressing complaints, concerns and other issues raised with us; and
- t. to monitor, review and moderate use of the Site and Platform. We do this to identify and prevent any harmful use of the platform or use in breach of our Terms of Use or our policies, or any attempts by Members to circumvent the Platform. In doing so we may access and use any information you provide to the Platform, including during communications with other Members.

In order to make use of Personal Information in these ways, we may provide it to our third party contractors for their assistance, as set out in section 7.3 below. Some of these contractors may be located overseas, as set out in section 7.7.

## **6.2 Creation of Anonymous Data**

We may create anonymous data records from Personal Information by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyse request and usage patterns so that we may enhance the content of our Platform and improve Site navigation. Mable may use anonymous data for any purpose and may disclose anonymous data to third parties as it sees fit.

## **7. Disclosure of your Personal Information**

7.1 We may disclose your Personal Information as described below and as described elsewhere in this Policy.

### **7.2 Disclosure to other Users**

- a. We may share your Personal Information with third parties to whom you ask us to send (or otherwise make available) that information, including other Members. This may be directed via your "Privacy Settings" on the Platform or otherwise.
- b. Except as described in this paragraph 7.2, we do not disclose the Personal Information of any Member to any other Member. We do, however, provide other Members with the opportunity to communicate with you through an anonymous in-browser message box.
- c. If you are a Support Worker, we will display initial information such as your photograph, your first name and the first initial of your surname, and the first few words of your profile description, in a results listing if a Visitor or a Member has searched for Support Workers in or near your suburb. However, your full profile can only be viewed by Members who have signed in to their Account, not by Visitors.
- d. Support Workers and Customers are described on the Site by their first name and first initial of their surname only. When a Customer and a Support Worker wish to make contact with each other for the purposes of Care Services, Mable will release Personal Information about each person to the other person (this will include each person's full name and contact details,

and may include health information and other sensitive information collected by us in accordance with this Policy).

- e. In addition, Approved Providers and other case managers and support coordinators may access the Personal Information of the individuals they assist, and of the Support Workers engaged by or for those individuals, and vice versa.
- f. If you are a Support Worker, we may provide a copy of your police check, working with children check, any other applicable screening checks and certifications, references, qualifications or other profile documents to Clients who engage you on Mable.

### **7.3 External service providers and other third parties**

- a. We may share your Personal Information with our third party service providers to:
  - i. provide you with services that we offer you through our Site;
  - ii. conduct quality assurance testing;
  - iii. facilitate creation of accounts; and
  - iv. provide technical support.
- b. Examples of such third party service providers include companies that:
  - i. review and verify information provided by Members seeking registration, and administer and verify background checks, including police checks, identity checks and other screening checks, as described in section 6.1 above;
  - ii. monitor, review and moderate use of the Platform and Site to identify and prevent harmful content or breaches of the Terms of Use, or circumvention of the platform, as described in section 6.1 above; and
  - iii. review our customer support calls and respond to messages received through the live chat function, as described in section 6.1 above; and
  - iv. process payments from both Support Workers and Customers.
- c. We may also disclose your Personal Information to our external service providers and advisers who have been engaged to provide us with legal, administrative, financial, accounting, auditing, insurance, research, marketing, business consulting, technology, support or other services. This includes providers who may assist with managing invoices, including data entry.
- d. In addition, we may disclose your Personal Information to:
  - i. other external service providers, consultants, or business partners of ours who may work with us to improve or develop our Site and Platform, operate or develop our business, conduct surveys or seek feedback from you, conduct market and other research, or facilitate or collaborate with us in relation to promotions; and
  - ii. without limiting paragraph 7.3(d)(i) above, providers of consumer review websites or platforms, to enable those providers to send you an invitation to leave a review of our Platform.
- e. If you are a Customer and you indicate that you (or an individual on whose behalf you are acting) have some form of government funding, we may share your Personal Information (or the Personal Information of the relevant individual) with third parties, including the relevant funding provider or funding manager, in order to verify the funding.
- f. We take reasonable steps to ensure these third party service providers, advisers, etc do not use your Personal Information other than for the purpose for which it was provided to them by Mable.

### **7.4 Disclosure of Personal Information to overseas entities**

- a. We may transfer or otherwise disclose your Personal Information to third parties located outside Australia, including to third parties who provide information technology and other services to us. Those third parties may be located in the United States, the Philippines, India or other countries.
- b. We may outsource certain aspects of the functions described in section 6.1 to our service providers located overseas, including for:
  - i. verification of information about Support Workers, as part of the approval and registration process (including verification against background and other checks);
  - ii. monitoring and reviewing use of the Platform and Site to identify and prevent harmful or breaching use, or circumvention of the Platform;



- iii. reviewing customer support calls;
  - iv. accounting functions, including management of invoices;
  - v. product analytics and customer event tracking and analysis;
  - vi. customer engagement, journey orchestration and cross-channel messaging;
  - vii. contact centre suite and communication;
  - viii. social media management; and
  - ix. application and infrastructure monitoring and logging.
- c. Wherever possible, Personal Information remains on our servers which are located in Australia so that providers are required to access that information via secure access to the Platform.
  - d. By providing Personal Information to us, you consent to the transfer of that Personal Information to entities located outside Australia.

## 7.5 Direct Marketing

- a. As indicated above, Mable may use information collected from or about you for the purpose of sending you marketing and promotional information and materials..
- b. If you wish to opt out of receiving direct marketing communications from Mable, please use the “unsubscribe” option (in the case of e-mail communications) or contact us directly using the details below. If you wish to opt-out of receiving direct marketing communications from third party organisations to whom we have disclosed your Personal Information, you may make a separate request to that organisation.

## 7.6 Marketing on third party sites

We may disclose your Personal Information, such as your email address and telephone number, to the operators of other websites, social media platforms and search engines, so that we may deliver tailored advertisements to you via those websites, platforms and search engines.

## 7.7 Affiliates and acquisitions

- a. We may share some or all of your Personal Information with and between Affiliates, in which case we will require our Affiliates to honour this Policy unless they have their own privacy policy (in which case, they will act in accordance with their own policy). This includes but is not limited to where you access or attempt to access services provided by our Related Bodies Corporate or agree to have your information shared.
- b. If another company acquires the shares in Mable, the business, or our assets, that company will possess the Personal Information collected by us and will assume the rights and obligations regarding your Personal Information as described in this Policy.

## 7.8 Other disclosures

Regardless of any choices you make regarding your Personal Information (as described in section 9 below), Mable may disclose Personal Information to third parties if it believes in good faith that such disclosure is necessary:

- a. in connection with any legal investigation;
- b. to comply with relevant laws, or to respond to subpoenas or warrants served on us;
- c. to lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- d. to investigate or assist in preventing any violation or potential violation of the law;
- e. where another “permitted general situation” or “permitted health situation” (as defined in the Privacy Act) applies; and/or
- f. where disclosure is reasonably necessary for a law enforcement related activity.

If you are a Client requiring Care Services for yourself, you acknowledge that a Support Worker may use Personal Information about your emergency contact to get in touch with that person if necessary.

## **8. Data collection**

### **8.1 Information collected by ad networks**

We may use third-party advertising companies to serve ads when you visit our Site. These companies may collect and use information (not including your name, address, email address, or telephone number) about your visits to the Site and other websites in order to provide advertisements about goods and services to you that are tailored to your interests. This information is collected using cookies. As indicated above, you can disable cookies by changing your browser settings, but if you do, some parts of our Site may not function properly.

### **8.2 Information collected by other third parties**

This Policy addresses only our use and disclosure of Personal Information we collect from and/or about you. If you disclose information to others, including to other Members, those persons or organisations will not be bound to act in accordance with this Policy. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable.

## **9. Your choices regarding your personal data**

### **9.1 Choices about marketing**

- a. We offer you choices regarding the collection, use, and sharing of your Personal Information for marketing purposes.
- b. We will periodically send you free newsletters and e-mails, SMSs or other marketing communications that directly promote the use of our Site or Platform (unless you have previously requested not to receive such communications from us). As we indicated in section 7.5 above, when you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive, or by contacting us directly (please see contact information below). Our electronic marketing activities will comply with the requirements of the Spam Act 2003 (Cth).
- c. Even if you request not to receive direct marketing communications from us, we may send you operational related communications including designated commercial electronic messages such as notices of any updates to our Terms of Use or this Privacy Policy.

### **9.2 Deletion of Personal Information**

- a. You may request deletion of your Personal Information by us, but please note that we may not delete it if we feel it is reasonable to keep the information (or choose to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements).
- b. If we believe that we no longer need your Personal Information for any purpose for which it may be used, kept or disclosed under the Privacy Act, and the information is not otherwise required to be kept under an Australian law or court order, we will take reasonable steps to destroy or permanently de-identify the information.
- c. When we delete any information, it will be deleted from the active database, but may remain in our archives. We may retain your information for fraud protection or similar purposes if this is permitted pursuant to an Australian law or court order.
- d. If we have already disclosed some of your Personal Information to third parties, we cannot force the deletion or modification of any such information by the parties to whom we have made those disclosures.

## **10. Security of your Personal Information**



- a. Mable is committed to protecting the security of your Personal Information. We use a variety of industry-standard security technologies and procedures to help protect your Personal Information from unauthorised access, use, and disclosure.
- b. Any information which we hold about you is stored on secure servers that are protected in controlled facilities. We also require you to enter a password to access your Account information. Please do not disclose your Account password to anyone who you do not wish to access your Account. We will assume all activity taking place on your Account is either being conducted by you or is authorised by you.
- c. Please notify us immediately if you become aware of any actual or suspected unauthorised use of your Account, or any breach of security relating to your Account.
- d. No method of transmission over the Internet, or method of electronic storage, is 100% secure, so while Mable uses reasonable efforts to protect your Personal Information, we cannot guarantee its absolute security.
- e. In addition, our employees and contractors who provide services related to our information systems are obliged to respect the confidentiality and privacy of any Personal Information held by Mable.

## **11. Access to your Personal Information**

- a. You can request access to the Personal Information we hold about you by contacting us using the details below.
- b. We will generally allow you to access the Personal Information we hold about you if you request it, but we may refuse access if we are permitted or required by law to do so.
- c. We will process requests for access to Personal Information within a reasonable time, and we may charge you reasonable costs associated with providing access (for example, to cover the costs of verifying the request and retrieving the information).
- d. If we refuse to provide you with access to your Personal Information, we will generally provide reasons for the refusal.

## **12. Correction of your Personal Information**

- a. We take reasonable steps to ensure the Personal Information we hold about you is accurate, complete and up to date.
- b. Please let us know if you think any of the information we hold about you is incorrect, incomplete or out of date. You may also change or update your Personal Information by logging into your Account and editing your Profile.
- c. If you ask us to correct your Personal Information, we will take reasonable steps to validate and correct the information, or we will provide reasons for not doing so. If we do not correct your Personal Information, you may make a statement about the requested change and we will take reasonable steps to attach this to the Personal Information in question.

## **13. Complaints**

- a. If you have any complaints about our dealings with your Personal Information, including any breaches by us of any Australian Privacy Principles, you are able to submit that complaint by contacting us using the details below. You will need to provide sufficient details regarding your complaint as well as any supporting evidence and information.
- b. Complaints will be referred for investigation by our Privacy Officer and a response will be provided to you within a reasonable time (usually no longer than 30 days). We may seek further information from you in order to provide you with a full and complete response.
- c. If you are not satisfied with the outcome of our investigation, you can contact us to raise your concerns, or you may wish to contact the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)) by telephone on [1300 363 992](tel:1300363992), by email to [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au), or by post addressed to GPO Box 5218, Sydney NSW 2001.

## **14. Changes to this Privacy Policy**

- a. We may update this Policy from time to time. We will post the updated Policy on our Site, so please check regularly for any updates. The updated Policy will take effect from the date of posting.
- b. Your continued use of our Site or Platform, or provision of further Personal Information to us after this Policy has been updated, will constitute your acceptance of the amended Policy.

## **15. Contact Information**

- a. Mable welcomes your comments or questions regarding the Site, our Platform, or this Policy.
- b. Please contact us using the following details. Email: [privacy@mable.com.au](mailto:privacy@mable.com.au) Telephone: [1300 736 573](tel:1300736573) , Post: PO Box 20846, World Square NSW 2002.
- c. Privacy Policy last updated on 22 July 2024.