



Triple P – Positive Parenting Program®

Privacy Notice for the PECE Webinar Registration Process

Effective as of June 2019

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The Triple P Group (“TPG”) is committed to protecting and respecting your privacy. Professionals and Managers of early childhood education providers may register to view a webinar about the Positive Early Childhood Education Program (PECE). To register for the webinar, we ask you to complete an online registration form that collects a limited amount of your personal data. This Privacy Notice explains who we are, why we collect this personal information from you, how we will use your data, the conditions under which we may disclose it to others and how we keep it secure.

Who We Are

TPG is a group of companies that are responsible for disseminating the Triple P-Positive Parenting Program® (“Triple P”) throughout the world. Triple P is a parenting and family support strategy developed by Professor Matthew Sanders and colleagues at The University of Queensland in Brisbane, Australia. Triple P aims to prevent severe behavioural, emotional and developmental problems in children by enhancing the knowledge, skills and confidence of parents, and is designed for use by a variety of health, education and social care professionals. PECE is part of the evidence-based Triple P – Positive Parenting Program. It was created to give Early Childhood Educators the tools to help children maximise their social, emotional and behavioural learning.

TPG is an international group of companies based in Australia, New Zealand, Canada, the United States, Chile, the United Kingdom and Germany. TPG comprises Triple P International Pty Ltd (“TPI”) and its related bodies corporate. TPI is an Australian company. Its postal address is PO Box 1300, Milton, QLD, Australia, 4064. TPI is the data controller with respect to the information collected during the webinar registration process. That means TPI makes the decisions about how and why your personal data is processed. TPI is committed to upholding your rights and protecting the personal information of all its customers and supporters.

If you have any questions about our use of your personal data, please contact our Data Protection Officer by email at dpo@triplep.net or by post at the above address. Where possible, please correspond with the Data Protection Officer by email.

What Personal Data We Collect & Why

When you register to view a webinar about PECE, we collect the following personal data:

1. Data we collect through visible form fields you complete:

- Your email address;
- Your first name;
- Your last name; and
- The name of the Company you work for;

2. Data we automatically collect through hidden form fields upon registration:

- The website instance you used to register;
- The registration key linked to your registration; and
- The date and time that you registered for the webinar;

3. Further data we collect during the registration process:

- Your subscription status (whether you register to receive the follow up direct marketing emails);
- The date and time you register to receive the follow-up emails (if you register);
- The source of your registration confirmation; and
- The date and time that the link to the webinar video is activated.

We will use your information for administrative purposes, including to send you a link to the webinar video. Once you activate the link to the webinar, you will be able to access the webinar for 5 days. Some of the personal data collected, such as the registration key and the time and date of activation, is processed to ensure the webinar is available for that period of time. The lawful basis for our processing the data in this way is our legitimate interest, in making the webinar available to you.

You will receive immediate access to the webinar once you submit the registration form. You will also automatically be sent an email upon completing your online registration. The email will invite you to subscribe to receive three direct marketing emails. The first direct marketing email will contain a link to re-watch the webinar at a later date and the other two direct marketing emails will contain a special offer regarding PECE. The lawful basis for our sending you this invitation to subscribe, is our legitimate business interest. You will only receive the three direct marketing emails if you subscribe. You do not have to subscribe, in order to watch the webinar. If you do subscribe, some of your personal data will be processed for promotional purposes. The legal basis for our processing your data in that way will be your consent. You can withdraw your consent at any time by using the unsubscribe links in the bottom of the emails or by contacting our Data Protection Officer at dpo@triplep.net. Please be aware that if you do withdraw your consent, this will not undermine the lawfulness of any processing that occurred before your consent was withdrawn. If you do subscribe to receive these emails, they will be sent to you automatically. We will not however use your personal information to make any automated decisions that might affect you. A record of your subscription will be stored in the third-party email marketing platform we use.

Some of the data collected through the registration form (the name of the organisation you work for and the number of times it appears in the list of webinar registrants) will be used for research and analysis purposes. We will undertake this analysis to gain greater insights into the organisations that are interested in PECE (having regard to the type of organisation and to the country where it operates). The lawful basis for our processing the data in this way, is our legitimate business interest in developing a deeper understanding of

our target market. The data will be analysed through a third-party operated online marketing platform and to the extent possible, this data will be de-identified.

How We Store and Secure Your Information

We are committed to providing secure storage for your personal information and will take all reasonable steps to protect your information from loss, misuse or alterations, having regard to applicable laws including the General Data Protection Regulation (*EU*) 2016/679 (“GDPR”). Your data will be collected via a webform on the PECE website (www.peceprogram.net), which was developed by TPI’s Communications Team with the assistance of a trusted independent contractor that manages TPG’s communications program. For more information please contact our Data Protection Officer at dpo@triplep.net.

Your registration data will be transferred to and stored in TPI’s private account on MailChimp’s online marketing platform. MailChimp is a third-party service provider. MailChimp is aware of the requirements of the GDPR and provides some information about the changes they have made in order to be GDPR compliant, on their website at: <https://mailchimp.com/help/about-the-general-data-protection-regulation/>. Information about how they secure your information, is available on their website at <https://mailchimp.com/about/security/>. This identifies that the data they hold is stored in various data centers in the United States. The EU Commission has made an Adequacy Decision with respect to the United States, meaning they recognise the United States as having an adequate level of data protection in place/comparable data protection laws to the EU. MailChimp list a variety of security mechanisms they have in place and identify that they undergo annual verification with a U.S. based third party-outside compliance reviewer under the Privacy Shield verification program, and have certified their compliance with the EU-US/Swiss-US Privacy Shield Frameworks.

Some of your data (your email address, registration key, the date and time of registration and the date and time of the activation of the webinar video link) is also stored on TPI’s private webserver for the purpose of facilitating your access to the webinar. The webserver is owned by Amazon and managed by TPI. It is located in the United States.

Only authorised personnel within TPI have access to your private information. This includes members of our IT and Communications Teams (including the trusted independent contractor who manages TPG’s Communication’s function). Their use of the data in the performance of their roles is limited to bulk actions undertaken for the purpose of general maintenance of the email list or the PECE website. Further, if you contact TPG’s Data Protection Officer for information or to unsubscribe from TPI’s communications, the Data Protection Officer and his support team will need to process some of your personal data in order to action your request.

Anonymised data may be shared with TPG’s PECE Team. For example, they may receive information about the types of organisations that the webinar registrants work for. The PECE Team will not be provided with any of your personal data.

Disclosure of Your Information

Your information will always remain confidential. We will not sell, rent or license your information. However, there are very limited circumstances where we will share your personal information outside TPI. We may

disclose your personal data to a third party, including a lawyer, when necessary to enforce our legal rights or if legally compelled to do so by a court or governmental entity. We may also share your personal data with service providers, in order to provide our services to you. For example

- We may disclose your information to service providers where it is necessary for the storage of the data or for the maintenance of the data or the IT systems where the data is stored. These service providers would typically include IT contractors or database designers; and
- We may disclose your information to service providers (such as the trusted independent contractor who manages TPG's Communication's function) for promotional purposes, provided we have a lawful basis to do so. The lawful basis will be either your consent or our legitimate interests.

How Long We Keep Your Information

The limited personal data that is also stored on TPI's private webserver, will be deleted approximately 30 days after registration for the webinar. The registration information that TPI stores with MailChimp will be used to send you our initial email and to segment the list and send you the subsequent emails, should you subscribe to receive them. At approximately 30 days after registration for the webinar, your identifiable personal information will be deleted from the MailChimp platform. We will retain some de-identified data on MailChimp that will be used for analytics and insight purposes.

EU Residents – Your Rights Regarding Your Information

If you live in the EU, you are entitled under the GDPR to certain information and have various rights regarding how we use your data, including the right to:

- Access your information;
- Rectification (to ask us to amend or update your personal data if it is incomplete or inaccurate);
- Erasure;
- Restrict the processing of all or some of your information (in certain circumstances);
- Object to our processing your personal data (in certain circumstances);
- Data portability;
- Not be subjected to automated decision making; and
- Withdraw your consent.

For more information about your rights under the GDPR, please contact our Data Protection Officer.

Your Right to Complain

If you live in the EU you also have a right to complain about us to a relevant supervisory authority. If you have a complaint about our use of your personal information, we ask that you please contact us first and give us an

opportunity to resolve the complaint. If you would like to contact a supervisory authority:

- If you are based in the UK, you should contact the UK's Information Commissioner's Office via their website at <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/> or write to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, United Kingdom, SK9 5AF.
- If you are based in Germany, you should contact the Federal Commissioner for Data Protection and Freedom of Information (die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit) at Husarenstraße, 53117 Bonn or by email at poststelle@bfdi.bund.de. Their website is <http://www.bfdi.bund.de/>.
- If you are based in the Netherlands, you should contact the Data Protection Authority (the Autoriteit Persoonsgegevens) by email at info@autoriteitpersoonsgegevens.nl or write to them at Prins Clauslaan 60, P.O. Box 93374, 2509 AJ Den Haag. Their website is <https://autoriteitpersoonsgegevens.nl/nl>.
- If you are based in another EU Member State, you should contact your country's privacy and data protection regulator (Supervisory Authority).

Any Questions

If you have any questions about our use of your information, please contact our Data Protection Officer (dpo@triplep.net). More information about our data protection practices is available in TPG's Privacy Policy on our website www.triplep.net.