

Champion Life Privacy Policy

APP Privacy Policy

We have implemented this Privacy Policy in accordance with the Australian Privacy Principles (APP) in order to be open and transparent about how we collect, hold, and use your personal information, and under what circumstances we may disclose or transfer your personal information.

Please note that this Privacy Policy forms part of the Champion Life Terms of Use.

Draft for legal review.

In this policy, Champion Life, we, us and our means Champion Life Education Pty Ltd (ACN 168 454 073). This policy applies to all Champion Life programs, including Strong and Sure (delivered with Endeavour Foundation for adults with intellectual disability), Champion Life Seniors, Champion Life for schools, and programs we deliver in partnership with allied health, disability, community, aged care and university partners. Words that are capitalised and not defined in this policy have the meaning given in the Champion Life Terms of Use.

Many of our programs are delivered to people through an Organisation, such as a disability or aged care provider or a school. Where an Organisation arranges access for the people it supports or its students, that Organisation and the people who help deliver the program, such as support workers, carers or teachers, may enter information into the platform and may view information through the platform as described in this policy.

Collection

We collect personal information:

- to create an account so that you can access and use Champion Life; and
- when you record a video performing an activity.

The type of personal information we collect includes your name, address, email, telephone number, video or photo of your likeness and any additional information you provide to us.

Health and other sensitive information

For some programs, including Strong and Sure, we collect health information and other sensitive information about a Participant. This may include information about a Participant's disability, health conditions and medications, mobility, balance and falls history, cognition and behaviour, support needs, goals, and wellbeing. This information is collected through the program, for example through an initial risk assessment, goal setting and tracking, and wellbeing check-ins, and is usually entered by a support worker, carer or other authorised person.

Health information and other sensitive information receive a higher level of protection under the Privacy Act. We only collect this information where it is reasonably necessary for the program and with the consent of the Participant or a person authorised to consent on their behalf, unless the law otherwise allows or requires the collection.

We collect information directly from you, or from a person authorised to provide it on a Participant's behalf. Depending on the program, this may include a Participant's parent, guardian or support person, their school or teacher, or the Organisation and its support workers or carers who help deliver the program.

Consent and capacity

Where a program is provided to a Participant who is a minor, consent is obtained from the Participant's parent or guardian, or through their school, before access is provided.

Where a Participant is an adult who may need support to make decisions, consent to take part and to the collection and handling of their information may be given by a guardian, decision maker or other

person authorised to consent on their behalf. The Organisation is responsible for ensuring that the appropriate consent is in place before a Participant takes part.

We will also collect personal information from you when you interact with us either online or over the phone in order to assist with your email or call.

Use

The personal information you provide is used for purposes related to our primary business operations, which is providing an immersive health and physical education, and wellbeing engagement service. Examples of when your information may be used include:

- providing you with access to Champion Life;
- delivering or recommending activities to complete;
- informing you about our products and services;
- providing you with services requested;
- administering your account;
- dealing with requests, enquiries or complaints and other customer care related activities;
- marketing our products and services generally; and
- carrying out any activity in connection with a legal, governmental or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.

For programs such as Strong and Sure, we also use personal information to deliver personalised movement sessions and health information, to operate the monitoring features, including the risk assessment, goal tracking and wellbeing check-ins, and to make information available to support workers and the Organisation through role-based dashboards so they can support the Participant and identify when more help may be needed.

We may also use personal information for purposes related to those described above which would be reasonably expected by you.

We will not use your information for purposes other than described above unless we have your consent or there are specified law enforcement or public health and safety reasons.

For the avoidance of any doubt we will not use images, video or other personal information of minors for any marketing or promotional purposes which result in that personal information being provided to third parties, without first obtaining the express permission of the minor's parents or guardians.

Research, evaluation and de-identified information

Some programs are evaluated to understand whether they are working and how they can be improved. Where a program includes evaluation or research, we may use information, and disclose it to approved research and evaluation partners such as universities and research institutes, for that purpose. Wherever practical, information used for research and evaluation is de-identified, so that individual Participants are not reasonably identifiable. Where information that is not de-identified is needed, we do this only with consent or where the law otherwise allows.

We may also create and use de-identified and aggregated information, which does not identify any individual, for purposes including improving our programs, reporting, research and demonstrating outcomes, and we may share that de-identified and aggregated information with partners and funders. Because this information does not identify individuals, it is not personal information.

Interacting with Us

If you contact us with a general question we may interact with you anonymously or through the use of pseudonym.

However, you are required to provide true and accurate details when you create an account and you agree that you will provide accurate information if so required.

Direct Marketing

From time to time we may send you marketing or promotion material. Marketing and promotional material will only be send to you if you have opted into receiving marketing material.

We (or an appointed third party) may also conduct surveys or market research and may seek other information from you on a periodic basis. These surveys will provide us with information that allows improvement in the types and quality of services offered to you, and the manner in which those services are offered to you.

To opt-out of receiving certain marketing material, you may contact us or select the “unsubscribe” link provided in the email.

Sharing your Personal Information

- We may disclose or receive personal information or documents about you to/from law enforcement agencies to assist in the prevention of criminal activities.
- Teachers and school administrators may receive personal information or documents about users assigned to the particular school.
- the Organisation that arranges a Participant’s access, and the support workers, carers or other staff of that Organisation who help deliver the program, may view information about the Participant through the platform, including through dashboards;
- where a program includes an optional connection to a Participant’s own general practitioner or allied health providers, we may share agreed information with those practitioners with consent;
- we may disclose information to approved research and evaluation partners as described in the Research, evaluation and de-identified information section;
- we may disclose information to service providers who help us operate the platform and deliver the programs, such as hosting and technology providers, who are required to protect the information and use it only for those purposes;
- Unless you consent or disclosed in this privacy policy, we will not disclose your personal information to third parties.

Overseas Disclosure

We host personal information in Australia. Some of the service providers we use, including our technology providers, are based overseas or may access information from overseas, including in the United States, in order to provide their services. Where this happens, we take reasonable steps to ensure the information is handled consistently with the Australian Privacy Principles. We will not otherwise disclose your personal information to entities overseas without your consent, unless the law allows or requires us to.

Security of your Personal Information

We store your personal information using secure servers protected from unauthorised access, modification or disclosure.

While we endeavour to only hold personal information that is accurate, complete and up-to-date, if you become aware this information is no longer accurate, complete or up-to-date please contact us to correct the information.

Participant security

Access to the platform is by secure login and is role-based, so a person can see only the information appropriate to their role. For school programs, a student's submitted videos can be viewed only by that student and their teachers, and teachers can remove inappropriate content and suspend accounts. For other programs, a Participant's information can be viewed by the Participant and by the support workers, carers and Organisation staff who are authorised to support them.

We host the platform with enterprise hosting providers, and hosting arrangements may differ between programs. For programs delivered on our current infrastructure, the platform runs across two providers, with a separately hosted backend and user-facing application, and Participant data, databases and backups are held onshore in Australia. Our hosting providers maintain independent security certifications. Where a program is accessed through an Organisation's own single sign-on, such as Endeavour Foundation's Microsoft Entra ID, sign-in is managed within that Organisation's security controls.

Data breaches

We take steps to prevent data breaches. If we become aware of a data breach involving personal information that is likely to result in serious harm, we will assess it and, where the Notifiable Data Breaches scheme applies, notify the affected individuals and the Office of the Australian Information Commissioner as required by law.

Disposal of personal information not required

If we hold personal information about you, and we do not need that information for any purpose, we will take reasonable steps to destroy or de-identify that information unless we are prevented from doing so by law.

How to access your Personal Information

Upon your request, we will provide access to your personal information we hold except in certain prescribed circumstances, including emergency situations, specified business imperatives, or law enforcement.

You may also ask us to correct personal information we hold about you if you believe it is inaccurate, out of date, incomplete, irrelevant or misleading, and we will take reasonable steps to correct it. If we decline to correct information, we will explain why.

How to contact us

If you have any queries, questions, concerns or wish to make a complaint regarding how we deal with your personal information please contact us by email support@championlife.com.au.

We will acknowledge and respond to your complaint within a reasonable time. If you are not satisfied with our response, you can contact the Office of the Australian Information Commissioner.

Disclaimer

While your privacy is very important to us, nothing in this privacy policy constitutes a voluntary opt in to any privacy law's, anywhere in the world, which we are not statutorily bound to comply with.

Amendments of this Privacy Policy

We are obligated to regularly review and update this policy. We therefore reserve the right to amend this Privacy Policy at any time. Should any significant amendments occur, notification will be provided by publication on the website 14 days prior to the changes being implemented unless the circumstances of the amendments make it unreasonable to provide such a notice period. Your continued use after the notice period has lapsed indicates your consent to be bound by the amended Privacy Policy.

For further information about privacy in general, please refer to the Office of the Australian Information Commissioner's website located at <http://www.oaic.gov.au>.

Alternatively, please contact our Privacy Officer **on** support@championlife.com.au.

Date of last Review

June 2026 (draft for review)