



Privacy Policy – Circletalk Australia App

1. Introduction

Circletalk Australia is committed to protecting the privacy of our users. As an NDIS Registered Provider, we take our responsibility to safeguard the personal information of neurodiverse individuals and those with complex disabilities, conditions, or talents ("Participants") and their primary carers ("Carers") seriously. This Privacy Policy outlines how we collect, use, disclose, and protect personal information in connection with our Capacity Building Mobile App ("the App") and assistive technology.

The App is available to anyone with a complex disability or condition, whether funded by the NDIS or self-funded, including those who are unable or have not yet accessed the NDIS. All information is entered by an Over 18yr old Participant or their Over 18 yr old Primary Carer. The Participant and their primary Carer have choice and control over what information they share that is purely related to assisting in remaining in education and transitioning to volunteering or paid work.

This app complies with the following NDIS Communication and Equipment guidelines for registration group 0124, which focus on providing communication supports and assistive technologies to NDIS participants. These services aim to enhance the participants' ability to communicate effectively and engage in daily activities.

Here's a brief summary of the key points:

1. **Communication Supports:**

- Services include assistance with augmentative and alternative communication (AAC) devices and strategies.
- The app ensures participants have access to appropriate tools and techniques to facilitate communication (e.g., speech-generating devices, communication boards, or apps).

2. **Assistive Technology (AT):**

- The app helps participants select and utilise communication devices suited to their needs.
- It supports improved independence in communication, contributing to a better quality of life.

3. **Person-Centered Support:**

- The app is designed to be adaptable to individual needs, preferences, and goals, offering user-friendly interfaces for personalized communication.

- It is part of a broader support system, which may include training and ongoing support for both participants and their caregivers.
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- 4. **Service Delivery Requirements:**
 - The app meets NDIS quality and safeguard standards, ensuring that participants receive services from well-trained providers.
 - It ensures that devices and communication aids are safe, durable, and function as required.
- 5. **Documentation & Reporting:**
 - The app supports clear documentation of services provided, with detailed records of equipment and device usage.
 - Accurate documentation helps ensure participants' progress and compliance with NDIS requirements.

This app adheres to these NDIS guidelines by providing a solution that helps participants communicate effectively and supports their independence, while meeting necessary service and safety standards.

2. Information We Collect

We may collect the following types of personal information through the App:

a) Personal Identifiable Information (PII)

- We only collect first name and year of birth
- Contact details email and mobile phone
- Carer information (if applicable)
- **We do not collect dates of birth, addresses, NDIS numbers, or any medical reports.**

b) Health & Support Information

- Disability or condition details (to the extent necessary for service delivery)
- Support needs and service preferences
- Chosen allied health and personal goals to help Participants stay in education, training, and the workplace
- Use of assistive technology, including device preferences and customization needs
- Communication preferences
- **We only collect information that directly relates to the Participant's goals in relation to staying in study and transitioning to volunteering or paid work.**

c) App Usage Data

- Mobile device information (e.g., device type, operating system, app version)
- Interaction and engagement with the App and assistive technology features
- In-app preferences, settings, and usage patterns
- Performance tracking and goal progress within the App

3. How We Use Your Information

We collect personal information through the App to:

- Delivered tailored support and capacity-building services
- Ensure compliance with NDIS regulations and reporting requirements
- Facilitate secure communication between Participants, Carers, and service providers
- Monitor progress, track goals, and improve user experience with assistive technology
- Send relevant notifications, reminders, and updates
- Conduct research and analysis to enhance service delivery and assistive technology effectiveness

4. How We Share Your Information

Circletalk Privacy Policy

At Circletalk, we value your privacy and are committed to protecting your personal information. This Privacy Policy explains how we collect, use, and safeguard your data when using our app, Circletalk.

1. Information We Collect When you use Circletalk, we may collect personal information that you provide directly, such as your name, email address, and any other details you choose to share. Additionally, we may automatically collect certain data regarding your use of the app, including device information, IP addresses, and usage statistics.

2. How We Use Your Information The information we collect is used to provide, enhance, and personalize your experience within Circletalk. This includes features such as user support, app updates, and notifications about services or promotions that may interest you.

3. Sharing of Information At Circletalk, we respect your right to privacy. We do **not** share your personal information with third parties. The decision of whether to share your information with others is entirely up to you. Circletalk gives you full control over who you connect with and share details within the app.

4. Your Control Over Information You have full control over your personal data on Circletalk. You can choose who you want to share information with, and you can modify or delete any information at any time. You also have the option to manage your privacy settings directly within the app.

5. Security We take security seriously and use industry-standard measures to protect your data from unauthorized access or disclosure. However, no method of data transmission or storage is completely secure, and while we strive to protect your information, we cannot guarantee its absolute security.

6. Changes to This Privacy Policy Circletalk may update this Privacy Policy occasionally to reflect changes in our practices or legal requirements. Any changes will be posted in this document with an updated "Last Updated" date at the bottom. We encourage you to review the Privacy Policy periodically for the latest updates.

7. Contact Us If you have any questions or concerns about this Privacy Policy or how your information is handled, please contact us at [contact information].

5. Data Security

We implement robust security measures to protect personal information, including encryption, access controls, and regular security audits. The App is designed with secure authentication features to protect user data. However, no system is completely secure, and we encourage users to take precautions when sharing personal information.

6. Data Retention

We retain personal data only for as long as necessary to fulfill service obligations or comply with legal requirements. Once no longer needed, data will be securely deleted or anonymized.

7. Your Rights & Choices

Participants and Carers have the right to:

- Access, update, or correct personal information within the App
- Withdraw consent for non-essential data processing
- Request data deletion (subject to legal obligations)
- Adjust notification and privacy settings within the App
- Lodge a complaint with the Office of the Australian Information Commissioner (OAIC) if concerns are not addressed

8. Children's Privacy

Where applicable, we obtain guardian or parental consent before collecting information from minors. We take additional precautions to protect children's data within the App.

9. International Data Transfers

While we primarily store data within Australia, some third-party services we use may store data overseas. We ensure such providers adhere to strict privacy and security standards.

10. Updates to This Policy

We may update this Privacy Policy from time to time. Any significant changes will be communicated via the App or email notification. Users are encouraged to check the App periodically for updates.

11. Contact Us

For any questions or concerns regarding this Privacy Policy, please contact us at:

Circletalk Australia

Email: info@circletalk.com.au

PO Box 956

Croydon, VIC 3136

AUSTRALIA

This Privacy Policy aligns with **NDIS and Australian Privacy Act (1988)** requirements. Users are encouraged to review it periodically to stay informed about their rights and data security.