



Triple P – Positive Parenting Program®

Global Privacy Notice for Triple P Online Programs

Application – Global

Effective as of 8 February 2023

Global Privacy Notice for the Triple P Online Programs

The Triple P Group (“TPG”) is committed to upholding principles of privacy and data protection. We are providing you with this Privacy Notice, to tell you about the information we collect from you when you use one of our online programs. In this Privacy Notice we will collectively refer to these as the “online program(s)”. This Privacy Notice explains who we are, why we collect your data when you register for and use the online programs, as well as how we will use, store, share and safeguard your data.

Who We Are

TPG is a group of companies that are responsible for disseminating the Triple P-Positive Parenting Program® (“Triple P”) and the Positive Early Childhood Education Program (“PECE”), throughout the world. Triple P and PECE were developed by Professor Matthew Sanders and colleagues at The University of Queensland in Brisbane, Australia. Triple P is a parenting and family support strategy which aims to prevent 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 a professional learning program aligned with Triple P, which gives educators the tools to help children maximise their social, emotional and behavioural learning. We have Triple P online programs designed for use by families/parents and one online program designed for use by practitioners. PECE online is designed for use by educators.

TPG comprises Triple P International Pty Ltd (“TPI”) and its related bodies corporate:

Company	Postal Address
Triple P International Pty Ltd	PO Box 1300, Milton, QLD, Australia, 4064
Triple P Parenting Canada Inc	PO Box 36015, Wellington Postal Outlet, Ottawa, ON, Canada, K1Y 3V4
Triple P America INC	1201 Lincoln St, Suite 201, Columbia, SC, 29201, USA
Triple P New Zealand Limited	Level 1, 15 Sultan Street, Ellerslie, Auckland, New Zealand
Triple P Latam Limitada	Almirante Pastene 185- 810, comuna de Providencia, Santiago, Chile
Triple P UK Limited	BM Box 9068, London, England, WC1N 3XX
Triple P Deutschland GmbH	Nordstraße 22, 48149 Münster, Deutschland

We are committed to upholding the rights and protecting the personal data of all online program users. TPI is the data controller of information collected and generated through the online programs. That means TPI decides how and why your personal data is processed, if you register for and/or use the online programs. 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 any of the above addresses. Where possible, please contact our Data Protection Officer by email as this will facilitate a quicker response to your query.

Application

This Privacy Notice applies to all Triple P and PECE online programs. Where you access our online programs through a project involving an agency, (e.g., government departments, healthcare providers and/or charities)

you may be provided with an additional Privacy Statement that is specific to the project. Project Privacy Statements should be read in conjunction with this Privacy Notice and are incorporated into the Terms of Use of the Online Programs, for the specific Project. If you participate in the Project, you will be taken to have agreed (consented) to the use of your data as set out in this Privacy Notice and in the Project Privacy Statement (if any). Where there are inconsistencies between this Privacy Notice and a Project Privacy Statement, the Project Privacy Statement prevails.

The Personal Data We Collect & Why

If you use the online program(s), you will provide us with personal data in the following ways:

1. By completing the online registration; and
2. By working through the program.

In addition, the system will generate information that relates to how you are using the online program (the Online Management System data).

The Online Registration

When you register to use the online programs, we ask you for the following personal data:

1. Your first and last name;
2. Your registration code;
3. Your email address; and
4. We ask you to create a password.

We will use your data for administrative support purposes, including creating your user account to access the program and assisting you if you experience any difficulties in accessing your account. The lawful basis for processing the data this way, is the performance of a contract, in providing you access to the online program.

Your Responses to the Program

When you work through the program, you will have the opportunity to record your observations, answers to questions and to work through exercises. In doing so, you will provide us with personal data. We hold that data for the purpose of allowing you to work through the program and to refer back to your answers and observations. The lawful basis of our holding your personal data in this way, is for the performance of a contract, in providing you with the online program(s). Access to the data is very restricted within TPG. Only our IT experts are able to access the data, however they have instructions not to do so.

TPG may use de-identified information from program responses, for a variety of purposes. We note however that, by its nature, de-identified information will not contain your or anyone else's personal data. The primary purpose for which de-identified data from program responses would be used, is for program development. TPG uses a continuous improvement model. It looks for insight into users' interactions with the program, to inform future developments. In addition, the de-identified data may be used to promote the online programs. For example, parts of the online programs include reflections from users on how they found the programs. De-identified aggregate data and/or excerpts may be included in materials such as presentations, proposals or tenders provided to prospective customers. This allows us to demonstrate the online programs' results and the different ways that people are using and benefiting from Triple P.

Sensitive Information/Special Category Personal Data

General

The questions or exercises within our online programs will not ask for information about you or your family's:

1. Racial or ethnic origin;
2. Political opinions;
3. Religious or philosophical beliefs;
4. Trade union membership;
5. Genetic data;
6. Biometric data;
7. Data concerning health;
8. Data concerning a natural person's sex life; or
9. Sexual orientation

(except in very limited circumstances which are addressed in the section below).

If you live in the European Union ("EU"), the *General Data Protection Regulation (Regulation (EU) 2016/679)* ("GDPR") applies to our use of your personal data. If you live in the United Kingdom ("UK"), equivalent laws referred to as the "UK GDPR" apply to the use of your personal data. The above types of personal data are treated differently under the GDPR and the UK GDPR. They are considered to be "special category" personal data and we are prohibited from processing that data (including recording or storing it) except in very limited circumstances. These include where you have given your express consent.

We therefore ask everyone using the online program, regardless of whether or not you reside in the EU or UK, not to enter any special category personal data into the platform (i.e. in your responses to the program). If you, against this direction from TPI, decide to enter either your special category personal data or the special category personal data of a child, where you are the child's parent or legal guardian, you will be taken to have given your explicit consent to TPI collecting and processing that special category personal data, in line with this Privacy Notice, by your act of volunteering the information (entering it). We will rely on that as the exception permitting the collection/processing of special category personal data under the GDPR or UK GDPR (as applicable), or any other data protection laws that contain similar requirements. The lawful basis of our collecting and processing the data will also be your consent. You can withdraw your consent at any time, by deleting the data from your responses to the online program. You can edit your responses via your program account. Please note that you must not, under any circumstances, enter another person's special category personal data into the online program, unless it is your child's personal data.

We also ask that you do not enter any information about criminal history/criminal convictions into the platform.

Specific (Very Limited Exceptions)

In very limited circumstances, where required for a specific project, we may seek to collect sensitive/special category personal data within our online programs. We will clearly note at the point of collection, that the provision of the information is discretionary. You do not have to provide this information to complete the online

program. If you do choose to provide the information, we will collect and process this information on the legal basis of your express consent.

Your Progress through the Online Program (the Online Management System)

The Online Management System will capture the following information:

1. Your first and last name;
2. Your e-mail address;
3. The module you are up to in the program (current module);
4. The topic you are up to within that module (current topic);
5. When you registered for the online program (registration date);
6. The date you last logged into the online program;
7. How many times you have logged into the online program; and
8. When your access to the program will expire (account expiry date).

The Online Management System captures program information, in order to send you reminders and track your progress. For example, the system is designed to send you reminder emails if you haven't logged into the program in a while. In addition, you may also choose to provide a mobile telephone number to receive reminders via SMS text messages. The lawful basis of our holding and using your personal data in this way, is for the performance of a contract, in providing you access to the online program. Further, we have a legitimate interest in collecting information about how users interact with our online programs, for the purposes of continuously improving the programs.

In addition, we may use your personal data to contact you in order to provide you with relevant information, such as program updates, or to seek your feedback including through surveys and testimonials. By using the online program, you consent to our contacting you to seek your feedback. Further, we have a legitimate interest in communicating with users of our online programs, so that they get the most out of the online programs and so that we can collect their feedback.

You can unsubscribe from receiving both our email and SMS text messaging services at any time, within the settings of your online program account. Occasionally the online program experiences a technical issue which prevents people from subscribing or unsubscribing to emails and/or text messages. Should that occur, we apologise and ask that you contact our Data Protection Officer, who will ensure the issue is promptly addressed.

Landing Pages

Landing pages may be created by TPG on behalf of our customers (Agencies), as part of a project delivering Triple P or PECE Online Programs to specific individuals. These web pages are designed so people who are eligible can apply to be part of the project. In addition to the Registration Data, further limited information may be recorded in order to ensure that only eligible visitors are offered access to the Online Programs through the particular projects and/or to identify the scope of services to be offered to people as part of the Project. For example, the landing page may ask how many children the parent has. If an Agency's project involves

individuals living in a particular geographic area, we may collect geographic information such as a post code, in order to identify eligible participants. Further, if the project involved individuals with a child or children within a particular age range, the landing pages may ask people to indicate if their children are within certain age brackets. The data captured on our landing pages is shared, for administration purposes, with the EU based third-party service provider that manages TPG's websites. Where Agencies wish to collect information on the landing pages, for example if they want to provide a link to a survey, we require that they provide a separate Privacy Notice which contains information about the personal data they are collecting, including but not limited to their purpose for collecting the data and how the data would be used, stored and shared.

Payment Information Not Collected

We use third-party service providers so that our customers can make online payments in a simple, reliable, and secure way. If you purchase access to one of our Online Programs yourself, rather than receiving access through an Agency, payment will be made via PayPal (except for customers in the Netherlands). For customers in the Netherlands, payment will be made by the payment service provider Mollie. The Mollie payment service provider is supervised by the Dutch Central Bank (DNB) as a regulated payment service provider under Dutch law. Whilst we may receive information about the transaction, we will not receive your payment information, such as your credit or debit card information. The Triple P Group has a strategic partnership with the Netherlands based Stichting Families Foundation. The Stichting Families Foundation manages the Mollie account, and will receive transaction data for purchases in the Netherlands.

PayPal or Mollie will be the Data Controller with respect to the personal data collected and processes, to facilitate payment. If you would like additional information, please consult the privacy and security information at:

- <https://www.paypal.com/au/webapps/mpp/ua/privacy-full>.
- <https://www.mollie.com/en/privacy>

Website Recording

We use Hotjar, a third-party technology service provider, in order to better understand our users' needs and to optimise this service and experience. Hotjar helps us better understand our users experience (e.g., how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymised form), device screen size, device type (unique device identifiers), browser information, geographic location (country only) and the preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. TPI has a Data Processing Agreement with Hotjar. Neither Hotjar nor TPG will ever use this information to identify individual users or to match it with further data on an individual user. For information about how Hotjar protects the data it holds, please consult their Privacy Statement that is available here: <https://www.hotjar.com/privacy>. We note that the user and usage data that Hotjar collects through its software is stored on the Amazon Web Services infrastructure in the Republic of Ireland (EU). Further information about data storage and compliance with data protection standards is available at <https://help.hotjar.com/hc/en-us/articles/115011639887-Data-Safety-Privacy-Security#data-storage>

How We Store Your Information

We are doing our utmost to protect your information and have put robust security mechanisms in place for the transfer and storage of your data. The personal data collected from users of our online programs, is stored in private databases hosted on Amazon's global infrastructure. The individual storage locations are set out in the following table.

Online Program	Storage Location (Amazon Infrastructure)
Triple P Online	
• English Language Version (UK)	Republic of Ireland
• English Language Version (Australia)	Australia
• English Language Version (United States of America)	United States of America
• English Language Version (North Carolina)	United States of America
• English Language Version (Canada)	United States of America
• English Language Version (Alberta)	United States of America
• Spanish Language Version	United States of America
• Dutch Language Version	Republic of Ireland
• German Language Version	Republic of Ireland
• French Language Version	Republic of Ireland
• Arabic Language Version	Republic of Ireland
Teen Triple P Online	
• English Language Version (UK)	United States of America
• English Language Version (other than for the UK)	United States of America
• Spanish Language Version	United States of America
• Dutch Language Version	Republic of Ireland
Fear-Less Triple P Online	
• English Language Version (United States of America)	United States of America
• English Language Version (other than for the USA)	Australia
Playwell Triple P Online	
• English Language Version	Australia
Primary Care Online	
• English Language Version	United States of America
PECE Online	
• English Language Version	United States of America
• Chinese Language Version	Australia
• Dutch Language Version	Republic of Ireland
All data collected via the landing pages, will be stored in the Amazon server in the United States of America.	

The personal data will be encrypted in transit and in back-up. Further information about how Amazon secures the data stored in its data warehouses is available at:

- <https://aws.amazon.com/compliance/>; and
- <https://aws.amazon.com/blogs/security/all-aws-services-gdpr-ready/>.

International Transfers of Data

As an international organisation, TPG needs to transfer data around the world, in order to operate its business. Data under the control of the TPG, including the personal data collected from you when you register for and use one of our online programs, may be stored and/or processed in the USA, Australia, EU and elsewhere in the world. By using the online course, you agree to the use of your personal data as outlined in this Privacy Notice, including the international transfer/storage/processing of your data to/in countries other than your own, including where those countries do not have comparable data protection laws and as such do not provide comparable levels of protection to the rights of data subjects.

Whilst we rely on your consent as the lawful basis for the international transfer of your personal data, we also note that Amazon, the third-party used for the storage of the data, has appropriate safeguards in place in line with the EU's & UK's data protection laws. Amazon has included the approved Standard Contractual Clauses, in its global terms and conditions, through a Data Processing Addendum. If for any reason we are unable to rely on consent as the basis for the transfer of personal data out of the EU (or the UK under the UK's equivalent data protection law; the UK GDPR), we rely on the Standard Contractual Clauses in the Amazon terms and conditions, as the basis for transferring the personal data of our online course users, outside of the UK & EU, to Amazon's infrastructure around the world. Information about Amazon's Data Processing Addendum is available at <https://aws.amazon.com/blogs/security/aws-gdpr-data-processing-addendum/>.

Automated Decisions

Automated decisions are decisions made without human involvement. Whilst the online programs have some automated functions, for example sending automated reminder emails if users have not logged-in in a while, generally your personal information will not be used to make any automated decisions that might affect you. In the very limited circumstances where an automated decision may be made, this will be brought to your attention within the program or within a supplementary Privacy Statement.

How We Share Your Information

TPI and its related bodies corporate (TPG) will always treat your information with respect. We will not sell, rent or license your personal data. Your personal data may be shared within TPG, provided we have a lawful basis to do so. All TPG personnel have undertaken training on the data protection requirements under the EU's data protection laws (the GDPR), which we recognise as the international gold standard. Further, all TPG personnel are subject to confidentiality obligations and are only authorised to process personal data if it is necessary for the performance of their role. We have access restrictions in place regarding the data associated with our online programs, so only authorised personnel have access to your private information. No-one within TPI (or TPG) is authorised to access the responses you enter into the online platform as you work through the program. The only employees who would be able to access that data, are TPI's IT experts, however they have instructions not to do so. Please refer to the "How We Store Your Information" section above for information about data storage.

A limited number of TPG employees have access to the Registration Data and Online Management System Data, in order to provide you with administrative support. Where the access code you used to register for the online program was paid for by an agency as part of a project between the agency and TPI and/or its related bodies corporate, personnel from the relevant TPG entity may process the Online Management System Data for the purpose of fulfilling the terms of the project agreement. This may include, for example, liaising with the

agency regarding the objectives of the project. The lawful basis of our processing the Online Management System Data in this way, would be our legitimate interest to develop and deliver projects involving the use of the online programs by agencies.

De-identified information may be exported from the platform and shared; however, we note that the information would not contain personal data.

Your personal data may be shared outside of TPG in very limited circumstances, where there is a lawful basis to do so. The lawful basis would be your consent, compliance with a legal obligation or our legitimate business interests.

The University of Queensland – The Creators of Triple P

Some personal data relating to the use of the online programs, may be shared with the University of Queensland's Parenting and Family Support Centre ("UQ"), who are the creators of Triple P. This would not include responses within the program (except in de-identified form). As the global disseminators of Triple P, we have a legitimate business interest to share limited data with UQ.

Service Providers

We may disclose your personal information to service providers where it is necessary for the collection and/or storage of the data, such as disclosing the data to Amazon for data storage purposes. We have a legitimate interest in using third party service providers for this purpose.

We may disclose your personal information to service providers where it is necessary in order for us to provide our services to you. For example, if our in-house IT personnel required the services of IT contractors, database designers and/or developers to maintaining and/or improve the online program/platform, your personal data may be shared with them. We have a legitimate business interest to use IT industry experts as needed to improve and deliver our services to you. Another example is the use of SMS text message distributors, should you elect to receive program reminders by text message.

In addition, we may disclose your personal data to service providers for communication and/or promotional purposes, such as sending you a product review survey so as to collect your opinions and experiences using our online programs. These service providers may include communications consultants, email distributors and survey software providers whose software is used to capture survey responses. We have a legitimate interest in using third party service providers for this purpose.

We will not provide your personal data to service providers, where we have concerns about their data protection practices. Any Service Provider will be subject to confidentiality obligations and will only be authorised to process your personal data on our behalf and in accordance with our instructions.

Payment Service Providers

As explained above, we use third-party service providers to process online payments. Where payment is made via PayPal or Mollie (for customers in the Netherlands), the service providers are the Data Controller with respect to the personal data collected and processes, to facilitate payment. Information about their privacy and security practices is available through the links above. The Netherlands based Stichting Families Foundation with whom TPG has a strategic partnership, manages the Mollie account, and will therefore receive transaction data (not payment data) for purchases in the Netherlands.

Agencies

Some people will access our online programs directly, by purchasing an access code themselves. Others will access our online programs through a project involving an agency, where the access code is paid for by the agency. Examples of agencies who may seek to deliver access to the Triple P Online Programs include government departments, healthcare providers or charities. If you access one of our online programs through an agency, the data contained within the Online Management System will be shared with that agency. We will not share your program responses with the agency.

The agency will be an independent controller of the data within the Online Management System (a joint controller under the EU & UK law). As such the agency will make their own decisions regarding how they will use that data. For example, the agency may choose to contact you to offer support when using the online program(s) or to seek your feedback etc. TPI and its related bodies corporate will not be involved with, or responsible for, the agency's use of the personal data within the Online Management System. We note that the agency, as an independent (joint) controller, will be subject to all of the obligations on data controllers under applicable data protection laws. If you live in the UK or EU, this includes the requirement that they provide you with a Privacy Notice that identifies how they intend to use, store, share and secure your personal data. You should consult the agency's Privacy Notice for information regarding how they will use your data. If they do not provide you with a Privacy Notice, you may wish to contact their Data Protection Officer.

Please be aware that, as the agency would be an independent (joint) controller of the data within the Online Management System, they may share that data with third parties. For example, an agency may share that information with a practitioner or agency that works with them, to support people in using the online program. If the agency does share personal data with a third party, that third party will be the agency's data processor. They will not be a data processor for or on behalf of TPI and/or our related bodies corporate. The agency will be responsible for ensuring that the third party has appropriate data protection practices and security measures in place and for providing them with instructions setting out how they are authorised to process the data on the agency's behalf.

To confirm whether a particular agency has access to your personal data within the Online Management System, please contact our Data Protection Officer.

Legally Required Disclosures

We may disclose any of 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 government entity.

How Long We Keep Your Information

TPG holds personal data for business purposes and to meet our legal obligations. All users of the online program(s) will have access to the platform for a period of 12 months. If a longer access period was required for a project or if requested by an individual user, the access period may be extended at TPI's discretion. Your personal data will be kept for the duration of your access to the online program(s). After your access to the online program(s) expires, TPI will retain the data in identifiable form for a period of between 1 and 2 years. In line with our data retention practices, your data will then be deidentified.

Your Rights Regarding Your Information

As a global business, we provide people all over the world with access to our online programs. The laws in different jurisdictions give people varying rights with respect to their personal data, including rights to receive certain information and rights to limit how their data is used. The strongest rights are afforded under EU law to EU residents (or under the equivalent UK law to UK residents). We recognise the EU data protection laws as the gold standard and where practicable (both logistically and financially), we aim to provide the same rights to all users of our online programs, regardless of where they reside.


The Rights of People in the EU or UK.

Under EU & UK data protection laws, EU residents and UK residents are entitled to certain information and have various rights regarding how we use their data. These include the right to:

- Access the personal data held about them;
- Rectification (amend or update the personal data we hold if it is incomplete or inaccurate);
- Erasure (destroy/delete the personal data we hold);
- Restrict the processing of all or some of their personal data (in certain circumstances);
- Object to our processing their personal data (in certain circumstances);
- Data portability;
- Not be subjected to automated decision making;
- Withdraw their consent; and
- Make a complaint about us to a relevant Supervisory Authority.

The following table contains the contact information for the UK Supervisory Authority and for the Supervisory Authorities in the EU member states where most of our EU based online program users live.

Country	Supervisory Authority's Contact Information
UK	You can contact the 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.
Germany	You can 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/ .
Netherlands	You can 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
France	You can contact the National Commission for Informatics and Liberties, 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France or by phone at +33 (0) 1.53.73.22.22. Further information is available on the website: https://www.cnil.fr/en/home



If you are based in another EU Member State, you should contact your country's privacy and data protection regulator (Supervisory Authority). For more information about your rights under the GDPR, please contact our Data Protection Officer.

Updates

This version of the Privacy Notice, updates and supersedes any prior Notice. TPI may update this Privacy Notice at any time. The "Effective From" section on the title page lists when this Privacy Notice was last revised. Any changes to the Privacy Notice will become effective when it is published on the TPG website.

Any Questions or Complaints

If you have any questions or a complaint, please contact our Data Protection Officer (dpo@triplep.net) or by post. Where possible, please communicate with the Data Protection Officer by email, as this allows for a quicker response. We ask that if you have a complaint, you please contact us before contacting a Supervisory Authority (Regulator), to give us the opportunity to hopefully resolve the issue.