



## Triple P – Positive Parenting Program<sup>®</sup>

Privacy Notice: Triple P Events held in Australasia and North and South America

Effective as of 3 August 2022

The Triple P Group (“TPG”) is a group of companies that are responsible for the dissemination of the Triple P-Positive Parenting Program® (“Triple P”) and the Positive Early Childhood Education Program (“PECE”), throughout the world. This includes delivering Triple P events/courses to practitioners. To deliver Triple P Events (which include the different components that may be applicable for a course e.g., training, pre-accreditation workshop, accreditation and clinical workshop event) we collect personal data from practitioners, both prior to and during the events (the Triple P Event Process). This Privacy Notice relates to in person or remote Triple P Events held in the Australasia, North America and South America. It provides information about the personal data collected from practitioners throughout the Triple P Event Process as well as information regarding how we will use, store, secure and share that data.

The Triple P Group recognises our responsibility to ensure that we comply with applicable legal, regulatory and contractual requirements in the collection, storage, use and destruction of confidential information, including personal data. We endeavour to stay current with the data protection laws of the countries and regions in which we operate. A central object of global privacy laws is to facilitate the free flow of information across borders while at the same time ensuring that people’s privacy is respected. The Triple P Group is committed to respecting the privacy of its customers and to protecting their personal information. We consider the data protection laws of the EU as the current, global gold standard. As such we require all of our personnel to undertake training in the laws of the EU and seek to provide our customers outside of Europe, with the same level of transparency and security, as our customers within Europe.

## WHO WE ARE

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 is regarded as one of the world's most effective parenting programs, thanks to decades of rigorous and ongoing scientific research. It 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. The Triple P Group is responsible for the dissemination of Triple P throughout the world. TPG comprises the Triple P International Pty Ltd (TPI) and its related bodies corporate.

| Company                        | Postal Address   | Registered Address  |
|--------------------------------|--|---|
| Triple P International Pty Ltd | PO Box 1300, Milton, QLD, Australia, 4064                            | Level 1, 22 Wandoo Street, Fortitude Valley, Qld, Australia, 4006                 |
| Triple P Parenting Canada Inc  | PO Box 36015, Wellington Postal Outlet, Ottawa, ON, Canada, K1Y 3V4; | Robson Court 1000-840 Howe Street Vancouver BC V6Z 2M1                            |
| Triple P America Inc           | 1201 Lincoln St, Suite 201, Columbia, SC, 29201, USA                 | 2711 Centerville Road, Suite 400, Wirmington, County of New Castle, Delaware, USA |

| Company                      | Postal Address   | Registered Address   |
|------------------------------|--|--|
| Triple P New Zealand Limited | Level 2, 10 Manukau Road, Epsom,<br>Auckland 1023 New Zealand<br><br>OR<br>PO Box 11090, Ellerslie, Auckland 1542<br><br>New Zealand | Lynch Phibbs Limited, Level Five, 60 Parnell<br>Road, Parnell, Auckland, 1052, New Zealand |
| Triple P Latam Limitada      | Almirante Pastene 185- 810, comuna de<br>Providencia, Santiago, Chile  | Isidora Goyenechea 3162 Of. 702<br><br>Las Condes, Santiago, Chile                         |
| Triple P UK Limited          | BM Box 9068, London, England, WC1N 3XX   | 6 St Colme St, Edinburgh, EH3 6AD UK   |
| Triple P Deutschland GmbH    | Nordstraße 22, 48149 Münster, Deutschland  | Nordstraße 22, 48149 Münster, Deutschland  |

Each company within the group is the provider of the Triple P Events held in their country/region, and controls and is responsible for the information collected during the Triple P Event Process. They may make decisions regarding how and why the personal data collected, will be processed. We note however that where practicable, the Triple P Group has adopted a standardised approach to data collection, processing, storage and protection, with respect to the information collected during the Triple P Event Process. Many business functions are centralised, and carried out at TPG’s Head Office in Brisbane Australia. This includes the IT/data security function.

If practitioners have any questions about this Privacy Notice or our use of their personal data, they should contact TPG’s Data Protection Officer (“DPO”) at [dpo@triplep.net](mailto:dpo@triplep.net) or by post using the postal addresses from the list of our companies above. Where possible, we ask that correspondence with the Data Protection Officer be by email, rather than by post, as this allows our DPO to provide a quicker response to people’s queries.

## TYPES OF PERSONAL DATA COLLECTED DURING THE TRIPLE P EVENT PROCESS

This Privacy Notice contains information about the personal data we collect from practitioners who decide to attend a Triple P Event. It relates to the data collected throughout the entire Triple P Event Process. Please note that this Privacy Notice is provided to/made available to practitioners at every stage of the process, when we seek to collect their data. It is also accessible through the welcome email sent upon registration and is on the provider network, which all trained and accredited practitioners have access to.

During the Triple P Event Process, personal data is collected:

### 1. When a practitioner registers for a Triple P Event.

In most countries in which we operate, we facilitate two types of Events; Open Enrolment Events (where practitioners may register directly) and Agency courses (which are separately arranged by Agencies for the delivery of Triple P training etc. to their personnel). Whilst the method of collection may vary, the same types of data are collected from practitioners attending Open Enrolment and Agency Events.

For Agency Events, registration details will be collected via email with the nominated lead/contact at the Agency. For Open Enrolment events, registration may occur in a variety of ways:

- **In Australia, New Zealand, Canada and the UK;** practitioners may pre-register for Open Enrolment Events using our Open Enrolment website. Alternatively, they may email us regarding their interest in attending a particular event. In both instances, practitioners will be contacted by our Training Coordinators and provided with a registration form. Final registration is completed via email by return of the completed registration form.
- **In the USA and Chile;** practitioners may download the registration form from our Corporate Website, or they may email us regarding their interest in attending a particular event, in which case they will be contacted by our Training Coordinators and provided with a registration form. Final registration is completed via email by return of the completed registration form.

2. When a practitioner completes the Additional Needs Disclosure Form (if applicable); and
3. When a practitioner completes forms provided to them before/during or after a Triple P event (note the event could be a Training, Pre-accreditation Workshop, Accreditation and / or Clinical Workshop event).

## Information Collected at Registration

### Open Enrolment website Pre-registration / Expressions of Interest

Where practitioners pre-register for an Open Enrolment Event, through the Open Enrolment Website (<https://www.triplep.net/provider-training-find-a-course/en/triple-p-training/#section-check-your-calendar>), the website will collect limited, mandatory contact information from the practitioner (First Name, Surname, email address, phone number, number of attendees seeking to register & country). This information will be used for administrative purposes:

1. To automatically generate and send the practitioner an email which contains:
  - Details of the course they have expressed interest in,
  - A copy of the information they provided through the website;
  - The contact information for the Triple P Operations Coordinator (“OC”);
  - This Privacy Notice; and
  - A Registration Form, which the practitioner will need to complete and return to the OC by email, in order to complete their registration for the course.
2. Where the practitioner does not respond within two (2) working days to the automated email, the OC will send the practitioner a reminder email.
3. We collect the country where the practitioner resides, as the Open Enrolment website is used by TPG to collect pre-registration for courses scheduled in many countries. If a person pre-registers for an event in another country, we will communicate with that practitioner to identify if there is alternate Triple P Event which may be more suitable (i.e. time zone) and to identify if appropriate resources (translations) are available for the delivery of Triple P in their country.

TPG relies on its Legitimate Business Interest, when it processes the practitioner’s personal data for administrative purposes. We have a legitimate interest in following up on an expression of interest in upcoming Triple P Events and to liaise with prospective attendees.

The Open Enrolment website also seeks to collect optional (discretionary) information regarding the organisation where the practitioner works. The information sought includes the organisation name, the type of organisation (i.e., company, charity, government body etc.) and an estimate of how many families the practitioner assists per year. This information, is gathered for statistical purposes only. We have a legitimate business interest to undertake statistical analysis for the purposes of better understanding our clients, informing our business activities and to build our evidence base.

### **Email Registration**

Registration via email occurs when a practitioner (or agency) contacts TPG to request the Open Enrolment course calendar (timetable) or where an agency contacts TPG to arrange separate Agency Training/Accreditation.

1. For Open Enrolment Events; the practitioner (or agency representative) will be emailed a copy of the Registration Form and this Privacy Notice, when they are provided with the Open Enrolment timetable. They will need to complete and return the Registration Form to TPG by email, in order to complete the registration for the event. TPG will send the practitioner a reminder email when appropriate.
2. For Agency Training Events, TPG will provide this Privacy Notice to the Agency Representative, who will be responsible for collecting and returning the Registration details of their practitioners in an excel spreadsheet. We rely on our Legitimate Business Interest, when processing personal data to follow up on expressions of interest/enquiries about upcoming Open Enrolment or Agency Events.

### **The Contact Details Collected via the Registration Form**

The Contact Details section of the Registration Form asks practitioners (for Open Enrolment Events) and the Agency Representative (on behalf of their practitioners for Agency Events) to provide us with the following personal data:

1. Their first and last name;
2. The organisation where they work;
3. Their role (job title);
4. Their phone number;
5. Their email address;
6. Their delivery address for resources (this may be their home address or work address – see further information below for more detail).
7. The course they are enrolling in; and
8. What, if any, Triple P courses the practitioner has previously completed.

We use this information for administrative purposes, in order to facilitate and manage a practitioner's attendance at the relevant Triple P events. This personal data is necessary for the performance of our contractual obligation, to provide the Triple P Event to the practitioner/agency. Examples of how a practitioner's information will be used for these purposes includes:

- Their name and email address will be used to set up their access to the Triple P Provider Network prior to the Training Event. The Provider Network contains information and tools to assist trained practitioners in using Triple P in their clinical practice. We use the data in this way, so that the practitioners may access

the relevant tools as of the first night of the Triple P Event.

- Their name and email address will be used to send the practitioner a confirmation email, either at the time the Registration Form is received or at least one month before the event is scheduled to start. For remote events, the confirmation email will include instructions on how to access the event on the videoconferencing platform as well as the link to the electronic resources (online forms). Information regarding the personal data collected in these forms and how that data will be processed, is set out in detail below. For practitioners who register for Open Enrolment via their organisation (Agency), the Manager at the Agency may be copied into the event confirmation email.
- Where a practitioner will be attending a remote pre-accreditation workshop and/or an accreditation event and/or clinical workshop, their name and email address are used to send the practitioner the electronic resources (online forms), in the same way as described above for training events. The practitioner will be asked to complete the forms at the end of the Triple P Event.
- Where a practitioner will be attending a remote Triple P training event, we will use their delivery address to send the practitioner physical resources such as Participant Notes and Facilitator Kits. The practitioner will receive an email confirming the dispatch of these materials from personnel at the relevant TPG warehouse. We note that the delivery address for resources, may be either the practitioner's work or home address. If a practitioner is working from home, we ask that they provide their home address for delivery purposes. Should the delivery of resources not arrive on time, they practitioner will be provided with an electronic copy of the Participant Notes, as they will need these during the event. Please note that it is the practitioner's responsibility to provide the correct address and the Triple P Group will not be responsible if resources are lost/delayed due to incorrect/incomplete address being provided.

### **The Payment Details Collected via the Registration Form (Open Enrolment Only)**

In this section of the Registration Form we collect the following data regarding the organisation or individual paying for the Training/Accreditation event:

1. Name;
2. Postal address;
3. Email address; and
4. Phone number.

The information we collect is needed to facilitate payment for the event, which will include the creation of a customer record and invoice and sending the invoice to the nominated email account. TPG accepts payment by electronic transfer or by cheque. Practitioners (or Agencies) may also request to pay by credit card. Where payment is made using a credit card, the payment will be made via PayPal. We will not receive the customer's credit card information. PayPal will be the Data Controller with respect to the credit card information and practitioners (or agencies) seeking to pay for the course this way, should consult PayPal's Privacy Policy and/or Privacy Notice for further information about how PayPal will deal with their data.

We collect a practitioner's (or agency's) billing information but not their banking/payment information, except where payment is made by cheque, as retention of a copy of the cheque is required to comply with financial record keeping laws.



## Information Collected via the Additional Needs Disclosure Form

We ask that practitioners tell us if they have an additional need which they believe may affect their participation in the Triple P Event. TPG and the Trainer(s) who will run the course, need to be made aware of any additional need, if we are to adequately accommodate the practitioner's needs, if possible, when delivering a Triple P Event. If provided, the information will be used for that purpose only.

We understand that information about an additional need is sensitive in nature, and may include health information. It is important that sensitive information is treated appropriately, and that TPG and the Trainers are made aware of your needs. That is why we ask you to complete and sign the Additional Needs Disclosure Form, which contains a statement of consent for our collection, use and limited disclosure (sharing) of this particular type of personal data.

We ask the practitioner to consent to our disclosing the information about their additional need, to the Trainer(s) who will provide the Triple P Event. The Trainer(s) will be either an employee of TPG or an independent contractor. All of our Trainers have undertaken training on Europe's data protection requirements, which TPG considers to be the global gold standard data protection legislation. As such all Trainers are aware of the standard expected of them with respect to privacy and data security obligations.

The Statement of Consent asks for the practitioner's signature, which is a type of personal data. It is collected for the purpose of demonstrating that the practitioner has read and agreed to TPG's collection, use and disclosure of the sensitive information, in accordance with the Disclosure Form and the information provided in this Privacy Notice. We collect both the practitioner's name and email address on the form, so that we may properly identify the practitioner. We require both pieces of data as there may be an occasion where two or more event attendees have the same name.

We rely on the practitioner's consent to processing the personal data regarding their additional need. Practitioners may withdraw their consent at any time by contacting the Data Protection Officer at [dpo@triplep.net](mailto:dpo@triplep.net). Should a practitioner withdraw their consent prior to the Triple P Event, TPG and the Trainer(s) will be unable to take any steps to accommodate the practitioner's additional need at the event.

### Complaints Regarding Additional Need

Whilst we will do our best to accommodate the additional needs of practitioners, if disclosed to us, it is important for practitioners to understand that there may be situations where this isn't possible. If a practitioner (who completed the Disclosure Form and did not withdraw their consent prior to the Triple P Event) is unhappy with TPG's and/or the Trainer's attempts to accommodate their need at the Triple P event, we ask that they please contact [training@triplep.net](mailto:training@triplep.net) to make a complaint.

In order to investigate the complaint, we will need to process and disclose the practitioner's personal data, including the information about their additional need, to the Head of Training, who is an independent consultant. Relevant TPG personnel (including personnel from the company that provided the training and personnel from TPI (who maintain TPG's head office), will be involved in the investigation of the complaint. Accordingly, we would seek to obtain a further statement of consent from the practitioner, in they would provide their explicit consent for TPG to process their data, including to share it with key personnel within TPG and disclose it to the Head of Training, for the purpose of investigating their complaint. We note that all TPG Personnel and the Head of Training, have completed training on the data protection requirements in Europe under the GDPR, which TPG recognises as the global gold standard data protection regime, and as such they are aware of the standard expected of them in terms of privacy and data security obligations.

## Information Collected During the Triple P Training event

As explained above, where a practitioner attends a Triple P Event, we seek to collect limited personal information from them via various electronic (online) forms.. These include:

1. Statement regarding Ongoing Research;
2. Electronic Communications Consent Form;
3. Benefits and Conditions of Accreditation Statement;
4. Contact Details Form;
5. Parent Consultation Skills Checklist (Pre-Training Assessment);
6. Parent Consultation Skills Checklist (Post-Training Assessment); and
7. Training Workshop Evaluation Survey.

### Statement regarding Ongoing Research

Triple P is an evidence-based program and the ongoing evaluation of Triple P events is part of our evidence-based approach. The data that is collected via the skills checklists and evaluation forms, will be used to evaluate the effectiveness of the Triple P Training. TPG has a legitimate business interest in identifying ways to improve the Training/Accreditation Events we offer. This is our purpose for using practitioner's personal data in this way. The form also refers to practitioners being entered on a register of trained Triple P providers. Maintaining a complete register of trained practitioners is essential for the Triple P Group's business. We rely on our legitimate business interest to process personal data associated with the creation and maintenance of this register (further information is provided below).

### The Electronic Communications Consent Form

We provide practitioners with the Electronic Communications Consent Form, as TPG would like to send them electronic direct marketing information. We respect the privacy of our customers. If practitioners decide to subscribe to our electronic direct marketing messages, we will not abuse their trust, we will send them limited, relevant messages and we will only ever send messages that relate to Triple P.

The types of messages we typically send include:

- Emails promoting relevant Open Enrolment Courses that the practitioner may be interested in attending. Practitioners would typically receive this type of email when courses in their area are scheduled and one or two reminder emails as the courses draw near.
- The Triple P Newsletter, which may include:
  - General information about Triple P and/or TPG;
  - Information about developments regarding Triple P;
  - The Triple P Introductory Guide and other tools that we may offer from time to time;
  - Information about research relevant to Triple P;
  - Case studies and/or testimonials;
  - General information about Triple P products and services, including special offers, new products releases and product updates; and



- Information about Open Enrolment training events and other events that are being offered.

We ask practitioners to select the tick-box if they consent (the legal basis we rely on) to receive electronic direct marketing messages from TPG. By ticking the box, a practitioner demonstrates that they have agreed to our sending them electronic direct marketing messages. We also ask the practitioner to enter the date when their consent was given.

Practitioners may unsubscribe from receiving TPG's electronic communications at any time by clicking on the unsubscribe link that appears in the footer of all of our emails or by contacting the Data Protection Officer. Practitioners may also update their subscription preferences at any time, so they only receive the types of messages they are interested in receiving. A link to the subscription preferences appears in the footer of all of our marketing emails. Should a practitioner unsubscribe, we will cease sending them direct marketing messages from that point on.

### **Benefits and Conditions of Accreditation Form**

This form outlines the benefits of and the conditions for acquiring accreditation in the provision of Triple P in a practitioner's work. The form asks for the practitioner to select the tick-box, for the purpose of demonstrating that the practitioner has read and agreed to the conditions of accreditation. TPG has a legitimate business interest in documenting that practitioners understand the conditions of accreditation. Whilst we seek their acknowledgement, failure by a practitioner to select the tick-box will not prevent them from achieving accreditation, provided attendance and other criteria are met.

### **Contact Details Form**

The Contact Details Form will ask for the following personal data:

- The practitioner's name (mandatory);
- The practitioner's date of birth (mandatory);
- The practitioner's contact phone number;
- The practitioner's preferred email address (mandatory);
- The practitioner's country of residence (mandatory);
- The practitioner's qualifications;
- The area of the practitioner's training;
- How many years of experience the practitioner has in parent consultation relating to child behavior;
- The average number of hours per week the practitioner spends in parent consultation relating to child behavior; and
- Details about the practitioner's employment including their employer's name, location, position, whether their employer would be classified as government, private, research etc. and the sector that their organisation is part of.

We note that only four of the information fields are mandatory. Providing the other data is discretionary. Our Trainers will provide guidance to course attendees at the start of the course, regarding what information fields in this form are mandatory or optional. TPG will use the mandatory personal data to compile a register of

persons trained to deliver Triple P in the relevant countries/regions in which we deliver training and accreditation services. We have a legitimate business interest in having a comprehensive list (“register”) of all practitioners who are trained and/or accredited in the delivery of Triple P. The register enables us to ensure practitioners are provided with information about updates to the program. It also equips TPG to identify anyone falsely asserting that they are trained and/or accredited to provide Triple P, so we may take appropriate action. Without the ability to do so, the reputation of Triple P® (the Positive Parenting Program) may be adversely affected, which would be detrimental to our business, to the reputation of the University of Queensland and to our trained and accredited practitioners. It is in all our best interests that Triple P’s reputation is maintained.

The optional/discretionary information collected in this form, is gathered for statistical purposes only. We have a legitimate business interest to undertake statistical analysis for the purposes of better understanding our clients, informing our business activities and to build our evidence base.

We will use the practitioner’s contact information for a variety of administrative purposes, which include:

- To track their progress through the course/course modules and facilitate accreditation. We have a legitimate business interest in using their data in this way, as it is essential that we can identify who has attended the relevant training, in order to provide accreditation.
- To set up their access to our Provider Network and to send the practitioner instructions for logging into the Network, if for any reason their access was not set up prior to the Triple P event. The Provider Network contains information and tools to assist practitioners in using Triple P in their clinical practice. The practitioners will receive access to the tools that relate to the particular Triple P Training they have attended. We have a legitimate business interest in ensuring that practitioners providing Triple P, have access to information and tools to assist them in the proper delivery of the program.
- To facilitate the shipment of training and programme resources to practitioners. We rely on our legitimate business interest in ensuring that trained practitioners have information and tools to assist in the proper delivery of the program.

### **Parent Consultation Skills Checklist (Pre-Training Assessment)**

This form asks practitioners to provide information about how they feel about providing Triple P in their practice, prior to undertaking the Training course. The questions address how adequately they feel they are trained and how confident they are in delivering Triple P.

### **Parent Consultation Skills Checklist (Post-Training Assessment)**

This form asks practitioners to provide information about how they feel about providing Triple P in their practice, after completing the Training course. The questions address how adequately they feel they are trained and how confident they are in delivering Triple P.

### **Training Workshop Evaluation Survey**

This form asks for a practitioner’s opinions about the Training event(s). Most questions relate to the performance by the Trainer and quality of the call (for remote courses run via video conferencing software) or the quality of the venue (for in-person courses). Practitioners will also be asked if they feel they now have the skills needed to implement Triple P in their work.

### **How We Use the Data Collected in the Checklists and Surveys**

Completing the Parent Consultation Skills Checklists and the Training Workshop Evaluation Survey is

discretionary. The opinions practitioners provide in these documents, will be added to their record on our customer relationship management (“CRM”) system. They will be used to provide feedback to the Trainer(s), for the purpose of improving their delivery of the event. As identified above, the data in these forms may also form part of our evidence base for the program. In that instance, we will process the data (in de-identified form) for the purpose of evaluating the effectiveness of the Triple P Training/Accreditation services we offer. By ‘de-identified’, we mean that the data will not be attributable to a particular person. TPG has a legitimate business interest in providing feedback to our Trainers and compiling the global Triple P evidence base.

## Information Collected During the Triple P Pre-Accreditation Workshop Event

The Pre-Accreditation Workshop Evaluation Form collects limited personal data including:

1. Name;
2. Course;
3. Email;
4. Date; and
5. Opinions

This form asks a practitioner to provide their opinions about the Pre-Accreditation Workshop event. Whilst most questions relate to the quality of the call (video conferencing software, with respect to remote events) or venue (with respect to in-person event) and the Trainer/training, the practitioner will also be asked if they feel they now have the skills to implement Triple P in their practice. The data collected will be used for the purposes described above, regarding the equivalent form used at Training events.

## Information Collected During the Accreditation Event

We will collect limited personal data from practitioners at Triple P Accreditation Events, via:

1. Accreditation Application Form;
2. Parent Consultation Skills Checklist (Follow-up Assessment); and
3. Accreditation Workshop Evaluation Survey.

### Accreditation Application Form

This form collects the following personal data:

1. The practitioner’s name (first name, family name and any previous name);
2. How the practitioner would like their name to appear on their certificate of accreditation;
3. The practitioner’s date of birth;
4. The email address the practitioner wishes to use to log into the Triple P Provider Network;
5. The date the practitioner attended the relevant Triple P Training Event;
6. The city where the Training Event took place;
7. The date the practitioner attended the Triple P Accreditation Event;
8. Whether the practitioner would like their certificate of accreditation mailed to their residential address, work address or to a PO box, and the relevant address;

9. The practitioner's employer's name (if they choose to send the certificate of accreditation to their work address); and
10. The practitioner's signature in acknowledgement that they have read, understood and agreed to be bound by the Triple P Providers' Code of Conduct.

On this form the Trainer will also record whether the practitioner passed or must recycle (retake) the quiz and/or the assessment against the set competencies.

TPG will use the information collected in this form for a variety of administrative purposes, including:

- To maintain an accurate record of those practitioners who achieved accreditation;
- To produce the practitioner's certificate of accreditation and send it to them;
- To provide the practitioner with ongoing access to the Triple P Provider Network. The practitioner will be asked to confirm the email address they wish to use to access the Provider Network, as accreditation may be completed sometime after the practitioner attended the associated Training Event and their email address may have changed.

### **Parent Consultation Skills Checklist (Follow Up Assessment)**

This form asks a practitioner to provide information about how they feel about providing Triple P in their practice, after completing the Triple P Accreditation event. The questions address how adequately the practitioner feels they are trained and how confident they are in delivering Triple P. The data collected will be used for the purposes described above, regarding the equivalent form used at Training events.

### **Accreditation Workshop Evaluation Survey**

This form asks a practitioner to provide their opinions about the Accreditation event(s). Whilst most questions relate to the quality of the call (video conferencing software for remote events), the quality of the venue (for in person events) and the Trainer, the practitioner will also be asked if they feel they now have the skills to implement Triple P in their practice. The data collected will be used for the purposes described above, regarding the equivalent form used at Training Events.

### **Information Collected during the Accreditation Process (if applicable).**

If a practitioner takes part in the accreditation process, their personal data is collected via the completion of:

1. The Triple P Accreditation Quiz Answer Sheet; and
2. The Competencies Checklist.

### **Triple P Accreditation Quiz Answer Sheet**

Practitioners will be emailed the Accreditation Quiz Answer Sheet, at the time they are sent the Accreditation schedule. TPG asks practitioners to complete the quiz and return it to the Training Coordinator or Operations Coordinator, prior to the associated Accreditation Event.

This form records the following personal data:

- The practitioner's name;
- The organisation where the practitioner works; and
- The practitioner's responses to the multiple-choice quiz that is part of the accreditation process.

The practitioner's answers to the quiz will be used by the Training Coordinator or the Trainer, to evaluate if that practitioner has passed, or if they need to recycle (retake) the quiz. Where a quiz forms part of an Accreditation Course, a practitioner will need to pass the quiz in order to achieve accreditation. TPG does not keep a record of a practitioner's answers to the quiz. We simply record whether the practitioner passed the quiz or whether there is a need to recycle the quiz. TPG does not seek to recover these forms from the Trainer(s). If an Accreditation Quiz Answer Sheet is returned to TPG, the answer sheet will be securely destroyed. Our Trainers are instructed not to retain these forms after the Accreditation Event is complete, but rather to securely destroy them.

### **The Competencies Checklist**

As a practitioner completes the accreditation exercises (role plays), the Trainer will record notes about their performance on this document. The Trainer will measure the practitioner's performance against set competencies for the purpose of determining whether the practitioner meets the accreditation requirements. The Trainer will evaluate if the practitioner has passed, or if they need to recycle (retake) the competencies assessment. TPG does not keep a record of a practitioner's performance against the individual competencies. We simply record whether the practitioner has passed or whether there is a need to recycle the role play exercises. TPG does not seek to recover these forms from the Trainer(s). If a Competencies Checklist is returned to TPG, the checklist will be securely destroyed. Our Trainers are instructed not to retain these forms after the Accreditation Event is complete, but rather to securely destroy them.

### **Information Collected During the Triple P Clinical Workshop Event**

We will collect limited personal data from practitioners at Triple P Clinical Workshops via:

1. Electronic Communications Consent Form;
2. Contact Details Form;
3. Parent Consultation Skills Checklist (Pre-Workshop Assessment);
4. Parent Consultation Skills Checklist (Post-Workshop Assessment); and
5. Workshop Evaluation Survey.

The information collected via these forms is the same for practitioners attending a Training Event or a Triple P Clinical Workshop Event (i.e., the same forms are used). Please see the relevant section above, in the part of this Privacy Notice that discusses the information collected during a Training Event.

In addition, we note that the information collected via the contact details form, will be used for a variety of administrative purposes, which include:

- To track their progress through the Clinical Workshop(s). We have a legitimate business interest in using their data in this way, as it is important that we can identify who has attended the relevant Clinical Workshop.
- To facilitate the shipment of Clinical Workshop resources to practitioners. We rely on our legitimate business interest in ensuring that trained practitioners have information and tools to assist in the proper delivery of the program.

## FEEDBACK FROM TRAINERS

The Trainer(s) may provide feedback about the behaviour of attendees at the Triple P event(s). For example, the Trainer may note that a particular attendee was disengaged and not involved in the event or that an attendee was disruptive. The Trainer's feedback may or may not contain identifiable personal information regarding a practitioner. When providing this feedback, most Trainers do not use the attendee's full name. Instead, they typically use the attendee's first name, initials or refer to an unnamed practitioner. The Trainer's feedback may be used as part of any investigation, should a complaint be made about the Trainer.

## AUTOMATED DECISIONS

TPG does not make any automated decisions (decisions made solely by automated means without any human involvement) that might affect practitioners.

## HOW WE STORE AND SECURE YOUR PERSONAL DATA

As an international business, we store data in a number of ways and locations. In order to operate, we utilise a network of our own computers in multiple countries, private physical IT infrastructure and third-party service providers whose infrastructure is used to store data. 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 Event Data

The information collected from practitioners who attend a Triple P Event (training course, accreditation course, clinical workshop etc.) is mostly contained in the resources completed during the delivery of the Event.

TPG utilises a third-party (Alchemer) survey platform to collect information via the electronic (online) forms. Alchemer recognises that the information collected through their platform is the property of the survey creator. That is, we are the owner and controller of any information collected via the online forms. Alchemer is an authorised data processor.

Alchemer provides that it will not, under any circumstances:

- Sell or rent customer information or respondent information to any third party; and/or
- Use Respondent Information for any purpose other than to provide services to our Customers.

Alchemer does not interact with the data collected through the surveys (respondent information), except where explicitly permitted by the survey creator. The only situation where TPG would instruct Alchemer to interact with the respondent information, would be if our access to the data was disrupted and our IT Department required Alchemer to investigate the issue and locate the data. Should this ever occur, the authority provided to Alchemer to access that data, would be limited to that purpose.

Further information about how Alchemer uses and protects personal data is available at:

- [www.alchemer.com/privacy/](http://www.alchemer.com/privacy/) (their privacy policy);
- [www.alchemer.com/privacy/gdpr/](http://www.alchemer.com/privacy/gdpr/) and <https://www.alchemer.com/resources/blog/gdpr-commitment/> (information about compliance with the GDPR);
- [help.alchemer.com/help/alchemer-security-overview](http://help.alchemer.com/help/alchemer-security-overview); and
- [help.alchemer.com/help/alchemer-security-overview#Information%20Security%20-%20Executive%20Summary](http://help.alchemer.com/help/alchemer-security-overview#Information%20Security%20-%20Executive%20Summary).



We note the Data Security section of Alchemer's Privacy Policy, summarises the security measures they have in place to protect the data they hold, such as the use of unique user names and passwords to access their platform. Alchemer's website states its commitment to "always meeting or exceeding GDPR compliance". Alchemer explains that it encrypts data in transit, at rest and on all backups. The data collected via the online forms is initially stored in the Alchemer Platform, which compiles the responses for all attendees at a particular Triple P Event into a report (excel spreadsheet) which can be accessed online and downloaded (exported from the platform). Access to the data within TPG's Alchemer account(s) is restricted through access controls, to the Trainer(s) and to TPG personnel who coordinate Triple P Events. The Trainers only have access to reports for Triple P Events they lead, and may log into the platform during the event to monitor completion of the forms and to assist practitioners.

The TPG personnel responsible for coordinating the event, will export the reports shortly after the event is completed, and will save the reports to TPG's private server, which is also located in TPI's private office in Brisbane, Australia. Once the Coordinators are confident the report has successfully been saved to the server, they will delete any local copy of the downloaded file from their computer. The information collected at pre-registration and registration is also stored on the server. There are electronic and physical security mechanisms in place to protect TPI's private office, which houses the server. The personal information stored on the server is not encrypted in transit or at rest, but is encrypted when the server is accessed remotely. Trainers may download the reports associated with their training session. Trainers are required to delete these files, and the electronic bundle, when instructed by the personnel responsible for coordinating the event. The Training Coordinators will regularly remove the data from the Alchemer platform. At this stage, the removal of the data will occur on a monthly basis.

The forms (reports) will be accessed by TPG's Data Entry Department, and the information will be entered into a private database (our CRM system), with entries for each individual practitioner. The database links to TPG's Provider Network and is stored in a private third-party (Oracle NetSuite) data warehouse located in the United States. Oracle (NetSuite) has extensive data security mechanisms in place including the encryption of data in transit and in back-up. Further information about how it secures the data stored in its data centers, is available at: <https://www.netsuite.com/portal/assets/pdf/ds-data-center-factsheet.pdf>.

### Information Contained in Emails

Information about course attendees may also be contained in emails, for example when information is sent between TPG's Training Coordination Department and the Trainers. Reports exported from Alchemer's platform may also be shared within TPG via email. The reports are in the form of excel spreadsheets. TPG's email network is controlled by TPI. The data contained in emails sent to and within the email network, is stored on the Amazon data warehouse in Sydney, Australia. The data is encrypted in transit and in backups. TPG believes Amazon's data warehouse has sufficient security mechanisms in place and is appropriate for the storage of TPG's emails. 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/>.

## Finance Data

Payment information will be processed when generating and sending invoice(s) and processing payment(s) of fees for Triple P Events. TPG utilises a centralised Head Office (TPI) which undertakes the finance business function for the group. The Finance Department's files have access restrictions and are stored on TPG's private server. Information regarding the location and security mechanisms in place to protect the server, is set out above in the section regarding the electronic resources (online forms).

## Data for Delivery of Physical Resources

TPG stores physical materials in private warehouses in various countries. Our warehouse personnel are authorised to access limited personal data stored on the Oracle (NetSuite) database, when processing an order for the supply of materials. The authority is limited to accessing delivery information. The following table sets out which warehouses supply the various countries in which we deliver events.

| Country               | Supplying Warehouse       |
|-----------------------|---------------------------|
| Australia             | Australia, Hong Kong      |
| New Zealand           | Australia, Hong Kong      |
| Canada                | Australia, Hong Kong      |
| USA                   | Australia, Hong Kong, USA |
| Chile / Latin America | Chile                     |
| UK & Ireland          | Australia, Hong Kong      |
| Germany               | Germany                   |
| Singapore             | Australia, Hong Kong      |
| Japan                 | Australia, Hong Kong      |

## HOW WE SHARE PRACTITIONERS' INFORMATION

The information we collect from the practitioners who attend Triple P Events, will always remain confidential. We will not sell, rent or license that information.

### Within TPG

The information may be shared within TPG, if necessary, for the performance of a contract with the practitioner (in delivering the Triple P event to them), if we have the practitioner's consent or it this is in our legitimate business interests. Please note that the personal data collected from practitioners during a Triple P Event will only be accessed and or used by TPG personnel who require access to that data for the performance of their role and have appropriate authorisation. All of our personnel are subject to confidentiality obligations and have undertaken training on the data protection requirements in Europe under the GDPR, which we regard as the global gold standard data protection regime.

The personal data may be shared outside of TPG in limited circumstances, for example where we have the practitioner's consent or we have a legitimate business interests to do so.

### The University of Queensland

Some of the practitioner data may, for example, be shared with the University of Queensland's Parenting and Family Support Centre ("UQ"), who are the creators of Triple P. As the disseminators of Triple P globally, TPG has a legitimate business interest to share limited data with UQ. An example of a situation where we would share personal data with the University, is if they wished to confirm whether a particular practitioner is

Triple P accredited. As the creator of Triple P, UQ has a legitimate business interest in knowing which practitioners are trained and/or accredited to deliver Triple P. Please note that, where de-identified information is sufficient, the data shared with UQ will be in de-identified form.

## **Agencies**

Practitioners may purchase training or accreditation courses themselves (referred to as Open Enrolment Training/Accreditation) or practitioners may be given access to our training/accreditation courses through an agency, where the course is paid for by the agency (referred to as Agency Training/Accreditation). Examples of agencies who may seek to deliver access to Triple P Events include government departments, healthcare providers or charities. Where a practitioner attends Agency Training/Accreditation, some personal data of the practitioner will be shared with the agency, usually via a report(s) on the Triple P Event. There may be some instances where an agency will pay for practitioners to attend Open Enrolment Training or Accreditation, rather than organising separate Agency Training/Accreditation. In these circumstances the agency may receive the report(s) on the Triple P Event, however the report will only include the personal data of those practitioners whose attendance was paid for by the agency. The report(s) will not contain the personal data of other practitioners who attended the Open Enrolment Event.

For Agency Training, the following information may be shared with the agency:

1. The name of the practitioners;
2. Information regarding their attendance; and
3. Feedback on the practitioner's behaviour. For example, if a practitioner was disruptive this may be reported back to the agency.

For Agency Accreditation, the following information may be shared with the agency:

1. The name of the practitioners;
2. Information regarding their attendance;
3. Feedback on the practitioner's behaviour. For example, if a practitioner was disruptive this may be reported back to the agency;
4. Whether or not the practitioner passed the quiz (a pass is necessary to achieve accreditation);
5. Whether or not the practitioner passed the competency assessment (a pass is necessary to achieve accreditation);
6. Whether or not the practitioner achieved accreditation; and
7. The date their accreditation certificate was issued.

The report(s) will also include summaries of the practitioner responses to the Parent Consultation Skills Checklists, however that information will be in de-identified form and as such is not personal data.

The Triple P Group have a legitimate interest to share limited practitioner personal data with agencies, where the agency purchased the Triple P Training and/or Accreditation for the practitioner(s). The agency also has a legitimate interest in knowing if the practitioner is trained and/or accredited to deliver Triple P, as well as whether the practitioner attended the course and how they behaved.

The agency will be an independent controller of the personal data shared with them. As such they will make

their own decisions regarding how they will use that data. They will be subject to all of the obligations placed on data controllers under applicable data protection laws. Practitioners should consult the agency's Privacy Notice or Policy for information regarding how they will use the practitioner's data, and if the practitioners are not provided with privacy information by the agency, they may wish to contact the agency's Data Protection Officer.

### **Third Party Service Providers**

We may provide a practitioner's personal data to our trusted third-party service providers and subcontractors, which they will process for the purposes of completing tasks and providing services to the practitioners, on our behalf. When we use third-party service providers, we disclose only the personal information that is necessary for them to deliver the service. We will not release any personal data to a third party who we are concerned does not have appropriate data protection and privacy practices in place. Further, where we release personal data to a third-party service provider and/or subcontractor, they will not be permitted to use the data for their own purposes, unless the particular data subject (practitioner) has asked us to do so, or we are required to do so by law. For example, TPG will disclose a practitioner's personal data to a third party, if compelled by a court order.

The third-party service providers with whom we may share personal data include:

- Alchemer, for the purpose of collecting data using electronic resources (online forms);
- Amazon & Oracle NetSuite, for the purpose of the storage of the data;
- IT services providers for the maintenance of the data;
- The Trainer(s) who will run the event.

The information that we may share with the Trainer(s) includes the name of practitioners who are registered for their event, as well as information relating any other Triple P courses those practitioners have previously attended. This information is shared with the Trainer(s), to assist the Trainer(s) in providing the event, as they can tailor its delivery to the specific attendees. As described above, TPG will also disclose any additional needs which a practitioner has disclosed, to the Trainer(s), provided the practitioner has provided TPG with their consent to do so. Where this information is disclosed to the Trainer(s), it is done for the purpose of the Trainer(s) accommodating the practitioner's additional needs, if possible, during the Triple P Event. We note that the Trainer(s) may be TPG employees or independent contractors. They are all trained to deliver Triple P Events and have all undertaken training on the data protection requirements in Europe under the GDPR, which we consider to be the global gold standard, and are aware of standard expected of them with respect to their data protection and privacy obligations.

- The Head of Training, for the purpose of investigating a complaint.

Should a practitioner (or agency) make a complaint about the Triple P event and/or the Trainer(s), information relating to the complaint will be disclosed to the Head of Training, for the purpose of investigating the complaint. The Head of Training is an independent contractor who has fulfilled this role for TPG for several years. In accordance with TPG policies, the Head of Training has undertaken training on the data protection requirements in Europe which we consider to be the global gold standard, and would only use a practitioner's personal data for the purpose of investigating and resolving the complaint. Further, we note that should the complaint include information about a practitioner's additional needs, for

example if a course attendee complained that the Trainer did not accommodate their additional needs at the Training event, then TPG would seek the practitioner's consent to disclose that sensitive personal data to the Head of Training.

- Where a practitioner consents to receive electronic communications from TPG, information such as their name, email address and subscription preferences may be shared with Bureau Blanco, the third-party who manages TPG's communications function. The limited personal data would only be shared for the purpose of sending relevant/appropriate electronic communications to the practitioner. The practitioner's name and email address may also be shared with Alchemer and/or MailChimp, third party service providers who we occasionally work with to send Triple P communications such as feedback surveys. We note that we will never authorise these third parties to use a practitioner's personal data for the third party's own purposes, including for direct marketing purposes.

### **Other**

In addition, TPG may disclose 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.

## **HOW LONG WE KEEP THE INFORMATION**

As part of TPG's everyday business operations, we collect and store different types of information, for different lengths of time. We may hold the personal data collected from practitioners during the Triple P Event Process, for as long as is necessary for the relevant processing activity to occur. Further, we are legally required to hold some types of information for certain periods of time (for example the collection of payments). We may retain personal data for longer periods than required by law, if it is in our legitimate business interests and not prohibited by law.

TPG maintains a record of practitioners who are Trained/Accredited to use Triple P in their clinical practice. The record is held for a period of approximately 70 years after the Triple P event/course occurred. The record of practitioners will include the practitioners' names, contact information, qualifications, place of work and aspects of Triple P that they are trained/accredited in. We have an ongoing need and a legitimate business interest to retain a record of all practitioners who have undertaken Triple P training and of those who have achieved accreditation, and to keep that record for a period that will encompass the entire possible duration of their clinical practice, where they may seek to utilise Triple P. Retaining the record of trained/accredited practitioners, enables TPG to provide ongoing support, information and resources to those practitioners, including to maintain their access to the Triple P Provider Network, and to identify anyone that is falsely asserting that they are trained/accredited to provide Triple P.

Where a practitioner consents to receive electronic communication from us, their data will be used for the purpose of sending them promotional messages (currently only in the form of emails) and will be retained whilst they continue to be subscribed. If the practitioner unsubscribes, they will no longer receive the promotional messages from TPG, however we will retain their completed consent form and unsubscribe request for some time, in order to demonstrate that appropriate consent was obtained.

If a practitioner would like more detailed information about how long we will retain their personal data, they may contact our Data Protection Officer at [dpo@triplep.net](mailto:dpo@triplep.net).

## PEOPLE'S RIGHTS REGARDING THEIR PERSONAL DATA

The laws in different jurisdictions give people varying rights with respect to their 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. 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 of our data subjects, regardless of where they reside.

If you are a practitioner whose data we have collected as part of the Triple P Event Process, the rights which we aim to provide to you (where practicable) are the right to:

- Access the personal data which we hold about you;
- Obtain a copy of the personal data which we hold about you and/or information about how and on what basis that personal data is processed;
- Rectify inaccurate personal data (including the right to have incomplete personal data completed);
- Erase your personal data (in limited circumstances, such as where it is no longer necessary in relation to the purposes for which it was collected or processed);
- Restrict processing of your personal data under certain circumstances;
- Port your data in machine-readable format to a third party (or to you) when we justify our processing on the basis of your consent or the performance of a contract with you;
- Obtain or see a copy of the appropriate safeguards under which your personal data is transferred internationally or to an international organisation;
- Withdraw your consent to our processing of your personal data, where the processing is based on your consent. This will not invalidate previous processing carried out prior to your withdrawing consent nor preclude our processing your data, if we have another lawful basis of doing so such as a contractual obligation or a legitimate business interest; and
- Lodge a complaint with a relevant supervisory authority. We ask that anyone who has a complaint about our use of their personal data, first bring the complaint to our attention by submitting it to the Data Protection Officer, so that we have the opportunity to address their concerns.

## UPDATES

This version of the Privacy Notice, updates and supersedes any prior version. The "Effective From" section on the title page lists when this Privacy Notice was last revised. We may update this Privacy Notice at any time. Any changes to the Privacy Notice will become effective when it is published on the provider network and online registration pages of our website and updated on our registration emails.

## ANY QUESTIONS

Any questions about the information in this Privacy Notice or about TPG's data protection practices should be directed to our Data Protection Officer by email at [dpo@triplep.net](mailto:dpo@triplep.net) (preferred) or using any of our postal addresses, which are provided above.