



COMPANY INFORMATION

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| COMPANY NAME: | Neurodiversity Academy Pty Ltd |
| ACN: | 653 679 497 |
| ABN: | 64 653 679 497 |
| OFFICE ADDRESS: | Rouse Hill, NSW, 2155 |
| EMAIL: | info@neurodiversityacademy.com |
| EFFECTIVE DATE OF POLICY: | 9 December 2025 |

1. PURPOSE AND SCOPE

Neurodiversity Academy Pty Ltd (“Neurodiversity Academy”, “we”, “our”, “us”) is committed to managing personal information in a fair, transparent, and responsible manner. Neurodiversity Academy acts in accordance with the Privacy Act 1988 and the Australian Privacy Principles. Our dedication ensures Neurodiversity Academy adheres to the requirements associated with the collection, use and disclosure of any and all acquired personal and private information submitted by an individual and information retained including but not limited to; prospective and active members, our staff, affiliates and contractors.

This Privacy Policy outlines how our internal server and cyber-security applications are consistent with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) in relation to the acquisition and storage of personal information. Through verbal and written communication and our voluntary web-based contact form, we may collect, store, use and/or disclose personal information however Neurodiversity Academy are committed to ensuring all data is safe, secure, and backed up regularly, providing confidence to all.

It's important to note that information pertaining to an individual is not disclosed to any third party without digital or written authorisation, acknowledging as an individual submitting personal information or requesting our services, you have first read and understood this policy.

As this policy references complaints and appeals, it's recommended to be read in conjunction Neurodiversity Academy's' *Complaints and Appeals Policy and Procedure* accessible on our website via the link provided in the website footer.

SCOPE

This Privacy Policy applies to:

- Students (prospective, current, or former)
- Partner institutions and organisations
- Employees and Contractors, and
- Associates

We operate exclusively within Australia and do not disclose information internationally, except as required by law.

2. DEFINITIONS & REFERENCE TERMS

- **Anonymity / Pseudonymity:** The option for an individual to remain unidentified or use an alternate name, where legal obligations allow.
 - Anonymity: The condition of being anonymous
 - Pseudonymity: The use of a different name from your real name, especially on something you have written
- **Consent:** Voluntary, informed, and explicit agreement by an individual to the collection, use, or disclosure of their information
- **Institution:** Refers to an approved and endorsed Vocational Education and Training (VET) Organisation, Registered Training Organisation (RTO), College, Higher Education/University, and Primary or Secondary school.
- **Personal Information:** Any information that identifies or could reasonably identify an individual.
- **Sensitive Information:** Information about an individual's health, neurodivergent conditions, learning preferences, or other personal characteristics.
- **Student Leads:** Information pertaining to an individual that is shared with approved partner institutions for the purpose of matching them with educational programs, provided the individual has first provided consent and agrees with the suggested referral suitability.

Founders/Directors: Refers to the founding directors of Neurodiversity Academy Pty Ltd, who hold ultimate authority over internal data access, system permissions, and staff onboarding.

3. COLLECTION OF PERSONAL INFORMATION

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| 3.1 | <p>Neurodiversity Academy collect personal and sensitive information provided by individuals voluntarily, primarily through online forms submitted requesting further contact and/or verbally or in writing during profile creation. Additionally, we may collect personal information through:</p> <ul style="list-style-type: none">● Online enquiry and registration forms,● Website interactions and cookies,● Social media platforms,● Marketing campaigns,● Telephone and email communications,● Referrals from partner organisations, and● Events, seminars, and outreach programs. <p>Personal Information Includes:</p> <ul style="list-style-type: none">● Full name, |
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| | <ul style="list-style-type: none"> • Contact details being preferred email and phone number, • Date of birth, • Gender, • Demographical location, • Employment status, and • Education history <p>Sensitive Information Includes:</p> <ul style="list-style-type: none"> • Neurodivergent conditions (e.g., ADHD, Dyslexia), • Learning preferences, • Cognitive support needs, • Educational goals, • Health-related information relevant to training support, and • Accessibility or known learning support requirements <p><i>Sensitive information is collected only when required and only with express consent</i></p> <p>Unsolicited Information: Any information received outside our forms will be assessed promptly and securely deleted or de-identified if unnecessary.</p> |
| 3.2 | <p>Our Privacy Policy is available and accessible at all times via our website. As to reflect our most principal core value of inclusivity, in the unlikely event the policy is not accessible in the provided format, or an individual is unable to comprehend the information contained within, Neurodiversity Academy will discuss the circumstances with the individual making the request. This discussion will seek to come to a solution where the policy can be provided in an alternative, appropriate format, if at all possible.</p> |
| 3.3 | <p>Purpose of Collection</p> <p>We collect personal information to:</p> <ul style="list-style-type: none"> • Improve accessibility to vocational education for neurodivergent individuals • Match individuals with appropriate education and training pathways • Facilitate referrals and lead generation for RTOs • Provide tailored education and support services • Communicate information regarding education opportunities • Improve our services and user experience • Comply with legal and regulatory obligations. |

4. USE AND DISCLOSURE OF PERSONAL INFORMATION

We use personal information only for primary purposes, including matching students to suitable institutions and programs. Neurodiversity Academy demonstrates our compliance with governing legislation by remaining open and transparent to all, disclosing methods of which personal and sensitive information is used and/or disclosed, whilst providing individuals the opportunity to amend communication preferences at all times where contact may no longer be applicable or wanted.

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| 4.1 | <p>We may disclose personal information to:</p> <ul style="list-style-type: none">• Partner Registered Training Organisations (RTOs) - <i>only upon informing the individual of subsequent VET pathways and solutions and obtaining prior consent to progress with services</i>• Higher Education and training providers• Government bodies where legally required• IT service providers and system administrators• Marketing platforms and CRM providers <ul style="list-style-type: none">• All third parties are required to comply with privacy, confidentiality, and data protection obligations. <p>We do not sell personal data.</p> |
| 4.2 | <p>Disclosure to Institutions (Student Leads)</p> <p>Our comprehensive practices ensure all individuals are contacted by authorised Company Representatives to obtain relevant information relating to their enquiry. Where an appropriate referral outcome is applicable, the individual is made aware that Neurodiversity Academy will reach out to the suitable institution to introduce them as a <i>Student Lead</i> that subsequently requires us to discuss elements of their personal and sensitive information.</p> <p>We ensure:</p> <ul style="list-style-type: none">• Consent is first acquired prior to progressing services, and• Only relevant details are shared. <p>Where Neurodiversity Academy use and disclose personal information to a Third Party Institution, the individual would reasonably expect the secondary use or disclosure of their personal information would take place.</p> |

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| 4.3 | <p>Direct Marketing</p> <p>Direct Marketing includes but is not limited to:</p> <ul style="list-style-type: none">• Newsletter and announcements issued via email• Phone calls announcing upcoming events and collecting their expression of interest <p>Upon an individual submitting an online enquiry, they are consenting Neurodiversity Academy to use their contact information for the purpose of direct marketing.</p> <ul style="list-style-type: none">• Marketing communications are sent only with prior consent obtained by an Individual accepting the online enquiry form declaration to receive such.• All communications include a clear unsubscribe/opt-out option where Neurodiversity Academy will promptly action this request by updating the Individuals internal profile to exclude them from direct marketing <p>Further information is outlined below in <i>Section 5</i> of this Policy</p> |
| 4.4 | <p>Cross-border Disclosure</p> <p>Personal information is not sent overseas.</p> |

5. CONSENT AND OPT-OUT

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| 5.1 | <p>Consent to collect, use and disclose personal information is obtained via checkboxes during signup</p> <ul style="list-style-type: none">• Sharing information with institutions is only with explicit, informed, and revocable consent of the individual. |
| 5.2 | <p>By providing personal information, individuals consent to its collection, use, and disclosure in accordance with this Privacy Policy.</p> <p>Individuals may:</p> <ul style="list-style-type: none">• Withdraw consent• Request deletion of personal data• Opt out of marketing communications at any time by following “opt-out” links within marketing communications and/or by contacting Neurodiversity Academy via email or phone with the details noted on page one (1) of this Policy. |

6. DATA STORAGE AND SECURITY

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| 6.1 | <p>Neurodiversity Academy Pty Ltd take reasonable steps to protect personal information from:</p> <ul style="list-style-type: none">• Misuse• Interference• Loss• Unauthorised access• Modification or disclosure |
| 6.2 | <p>STORAGE AND SECURITY All data and information is stored securely utilising:</p> <ul style="list-style-type: none">• Microsoft 365 applications accessible only through two-factor authentication processes,• Additional access controls,• Staff confidentiality obligations, and• <i>Amazon Web Services Australia (AWS) (Sydney).AWS is a cloud storage solution</i> |

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| | <p><i>intentionally integrated by Neurodiversity Academy that meets global security, compliance information governance standards.</i></p> <p>Encryption at rest and in transit; SSL for transmission.</p> |
| 6.3 | <p>INTERNAL ACCESS</p> <ul style="list-style-type: none"> • Internal Role-based Access Permission: Individual data and system access is restricted based on internal roles and responsibilities. Reporting and data export abilities are strictly limited to Founders and authorised staff. • Staff digital access is managed, controlled and granted only by Founders upon onboarding individual Staff members based on individual staff member roles and responsibilities |
| 6.4 | <p>HARD COPY AND PRINTED DOCUMENTATION</p> <p>Printed information is prohibited unless performed by a Founder or exported under direction of a Founder for internal audit purposes. In the event paper records are necessary, these will be stored securely in a locked office with restricted access – records will then be appropriately destroyed upon completion of use or archived in our digital code-locked archive room.</p> |
| 6.5 | <p>ONLINE RETENTION PRACTICES</p> <p>Regular backups of systems, files, software and otherwise are conducted and maintained through AWS via both manual initiation of backups, and routine, scheduled backup automation.</p> |

7. ACCESS, CORRECTION, AND RETENTION

It is the right of any Individual to access to their personal information and/or request correction of their details. Neurodiversity Academy has implemented various processes to ensure we meet this obligation with mandatory measures in place to protect all individuals against fraudulent amendments.

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| 7.1 | Individuals regardless of Neurodiversity membership status can access or update data through accessing/logging into their online profile, or direct request via phone or email. |
| 7.2 | Email and phone requests are actioned only first through an identification verification process to confirm the request is received by the individual themselves and processed promptly. |
| 7.3 | Individual information is retained until a request for their account deletion or membership cancellation is received upon which all personal information is securely destroyed. Notwithstanding the above, Neurodiversity Academy will retain certain records for minimum periods where required by law, including financial and taxation records as required under the Corporations Act 2001 (Cth) and applicable taxation legislation. |
| 7.4 | Login credentials and password updates are only able to be actioned on behalf of an individual through predetermined security questions prior to updates being achieved |
| 7.5 | Where an Individual requests correction of their personal information, in order to protect the privacy of the individual, Neurodiversity Academy will not communicate these changes to any Institutions that were associated with referral practices. We will however suggest any applicable corrections should also be disclosed to any Institution where details require currency for any necessary communications. |

8. COMPLAINTS AND DISPUTE RESOLUTION

Please refer to our *Complaints and Appeals Policy and Procedure* for our detailed process pertaining to submission of complaints and appeals including our dispute resolution practices where mediation may result.

Furthermore, complaints are received from a position of non-bias as to support the Complainant and identify any concerns that subsequently need to be addressed. All complaints are acknowledged first verbally to express empathy, obtain a further understanding of the circumstance and followed up in writing to further verify the complaint has been received outlining the result of the complaint being agreed solutions and/or any applicable actions or further steps Neurodiversity Academy will undertake to resolve or rectify the situation. Any complaint lodged is attended to in accordance with our *Complaints and Appeals Policy and Procedure* and resolved in a timely manner with confidentiality.

Complaints may be submitted to the following: **Privacy Contact:** Will Wheeler, CEO & Founder

Email: info@neurodiversityacademy.com

9. ANONYMITY AND PSEUDONYMITY

- Individuals may request anonymity or pseudonymity when providing sensitive information.
- Certain disclosures may require verification to comply with legal obligations relating to confirmation of identification.

10. DETAILED AUSTRALIAN PRIVACY PRINCIPLE (APP) REFERENCES

- **APP 1:** Open and transparent management of personal information.
- **APP 2:** Option for anonymity and pseudonymity where lawful.
- **APP 3:** Collection of solicited personal information relevant to services.
- **APP 4:** Dealing with unsolicited personal information; secure disposal if unnecessary.
- **APP 5:** Notification of collection, purpose, and potential disclosures.
- **APP 6:** Use and disclosure only for primary purpose unless exceptions apply.
- **APP 7:** Direct marketing requires explicit consent and opt-out options.
- **APP 8:** No cross-border disclosure without safeguards.
- **APP 9:** Adoption or disclosure of government identifiers only if required.
- **APP 10:** Quality of personal information: accurate, up-to-date, complete.
- **APP 11:** Security of personal information: reasonable steps to protect.
- **APP 12:** Access to personal information on request, subject to exemptions.
- **APP 13:** Correction of personal information if inaccurate, incomplete, or outdated.

11. UPDATES TO THIS POLICY

This Policy will be reviewed periodically or where applicable legislation undergoes updates directly correlated to our operational procedures and/or practices.

The latest version is published and accessible on our website specifying the effective date. In the instance revisions are made that impact active members, individuals whose information is retained, our Affiliates, and/or endorsed institutions, an email will be administered upon finalisation.

Such written communications will identify the applicable updates and outline how they may affect those who the amendments pertain to. In addition, information on how to view the updated *Privacy Policy* will be detailed within the communications to ensure transparency regarding accessibility is achieved.

12. VERSION CONTROL

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| Draft V1.0 (Dec 2025) | Initial draft including APP references and student lead consent |
| Version 1.0 (Dec 2025) | Finalised for publication; includes Definitions, Consent, and APP details |
| Draft V2.1 (Dec 2025) | Revisions to Version 1 including elaboration on information within each section of this policy. |
| Draft V2.2 (Jan 2026) | Revisions to Version 2.1 including elaboration on information within each section of this policy. |
| Draft V2.3 (Jan 2026) | Revisions to Version 2.2 as identified in yellow – submitted for Director/s review and approval prior to finalising and publishing on website |
| Draft V2.4 (April 2026) | Minor corrections to V2.3 including removal of incorrect legislative reference, addition of Founders/Directors definition, retention period carve-out, and grammatical fixes. Submitted for Director/s review and approval prior to finalising and publishing on website. |

END OF PRIVACY POLICY

