Ignition Gamers Privacy Policy

1. About this policy

This policy explains how Goldlaine Pty Ltd (ACN 664 349 142), trading as Ignition Gamers (ABN 70 664 349 142), collects, uses, stores and shares personal information. In this policy, "we", "us" and "our" means Ignition Gamers.
It applies to everyone whose information we hold, including:

- young people who come to our sessions (participants)
- parents, carers, guardians and NDIS nominees
- support coordinators, plan managers and other providers we work with
- people who visit our website, use our online courses or contact us
- people who apply to work with us

The laws we follow

We provide a disability service and hold health information, so we are covered by the *Privacy Act 1988* (Cth) whatever our annual turnover. We follow:

- the **Australian Privacy Principles (APPs)** in Schedule 1 of the *Privacy Act 1988* (Cth)
- the **Notifiable Data Breaches scheme** in Part IIIC of the *Privacy Act 1988* (Cth)
- the ***Health Records (Privacy and Access) Act 1997*** **(ACT)**, because we deliver services in the ACT and keep health records, and the *Health Records and Information Privacy Act 2002* (NSW) for participants who live in NSW
- the ***Spam Act 2003*** **(Cth)** for any marketing emails and messages
- the **NDIS Code of Conduct**, which includes respecting the privacy of people with disability

We are not a registered NDIS provider. We still take the same care with your information.

2. Information we collect

We only collect information we need to provide our services, run the business and meet our legal obligations.

Personal information

- names, dates of birth, ages, addresses, phone numbers and email addresses
- parent, carer, guardian, nominee and emergency contact details
- NDIS details, such as NDIS number, plan dates, how the plan is managed, and plan manager or support coordinator details
- invoicing and payment records (card payments go through Stripe, and we do not store full card numbers)
- session notes, goals, progress records and incident records
- photos or video, only with consent
- online course enrolments and progress

- emails, messages, call notes and enquiries
- website and social media data, such as device type, IP address, pages viewed and cookies (see our Cookie Policy)
- job applicant and worker details, including Working with Vulnerable People registration

Sensitive information

Some information we hold is **sensitive information** under the *Privacy Act 1988* (Cth). This includes health and disability information, such as:

- diagnoses and disability details
- support needs, communication preferences and sensory needs
- behaviour support plans and risk information
- information in NDIS plans and reports from other professionals

We only collect sensitive information with your consent and when it is reasonably necessary for our services (APP 3.3). The exceptions are where the law requires or authorises it, or where it is needed to lessen or prevent a serious threat to someone's life, health or safety (APP 3.4).
We only use sensitive information for the purpose it was given, or a directly related purpose you would reasonably expect (APP 6.2(a)(i)). We never use it for marketing without your express consent.

3. How we collect, use and share information

How we collect it

We collect most information directly from you, through intake and booking forms, service agreements, sessions, phone, email, our website and our online courses.
We may also collect it from parents, carers, nominees, support coordinators, plan managers or other providers. Where it is sensitive information, we ask for your consent first.
If we receive information we did not ask for and could not have collected, we destroy or de-identify it where lawful (APP 4).

Staying anonymous

You can ask general questions without giving your name, or use a pseudonym (APP 2). To book sessions, deliver supports or invoice your plan, we need to know who you are. If you choose not to give us information, we may not be able to provide our services.

How we use it

- to plan, deliver and record sessions and supports
- to keep participants, families and workers safe, including managing incidents
- to invoice plan managers, self-managed participants and private payers
- to talk with you about bookings, changes and your services
- to deliver and improve our online courses and services
- to recruit, roster and manage our workers
- to meet our legal, insurance and reporting obligations

We only use information for another purpose if you would reasonably expect it, you consent, or

the law requires or allows it (APP 6).

Who we share it with

We do not sell personal information. We share it only when needed, and only as much as is needed:

- **plan managers and self-managed participants**, to claim payment for supports
- **carers, support coordinators and other providers**, including progress reports, with your consent
- **the NDIS Quality and Safeguards Commission**, police, child protection services or emergency services, where the law requires or authorises it, or to prevent a serious threat to someone's safety
- **professional advisers and insurers**, such as our accountant, lawyers and auditors
- **service providers** who help us run the business (below)

Our service providers

These providers may store or process personal information for us.

Provider	What we use it for	Where data may be stored
ShiftCare	Participant records, rostering, shift notes, invoicing	Australia
Everbility (AI processing by OpenAI)	Drafting reports from shift notes (staff review every report)	Australia (stored); AI processing in Australia and the United States, not retained
Claude (Anthropic)	Drafting and replying to emails (staff review every message)	United States (stored); processing may also occur in other regions
Xero	Accounting and invoicing	United States
Employment Hero	Payroll (workers only)	Australia
BrightHR	HR records and worker incident records	Australia
Dubsado	Intake forms and service agreements	United States
Calendly	Session bookings	United States
Zapier	Moving intake data between systems	United States
Google (Gmail and Google Calendar)	Email, documents, and calendars synced with ShiftCare rosters	Google data centres in North and South America, Europe, Asia-Pacific (including Australia), the Middle East and Africa
VentraIP	Email hosting	Australia
Learnworlds	Online courses	United States, Europe, Brazil and Singapore
Stripe	Card payments	United States and Ireland, with some processing in Australia

Provider	What we use it for	Where data may be stored
Ezidebit	Direct debit and recurring payments	Australia and the United States
Mailerlite	Newsletters	European Union (Germany and the Netherlands)
ANZ	Banking	Australia and New Zealand
Meta, YouTube, LinkedIn, TikTok	Social media and advertising	Meta (Facebook, Instagram): United States, Europe and Singapore. LinkedIn: United States. TikTok: Singapore, Malaysia and the United States. YouTube: Google data centres worldwide

Some of these tools connect to each other, for example our booking, intake and payment systems. Each provider also handles data under its own privacy policy. We remain responsible for how we use and share your information, and we choose providers that protect it.

Information sent overseas

Some of these providers store or process data outside Australia, including in the United States, Europe, Brazil, Singapore, Malaysia and New Zealand, and other countries where Google operates data centres. Before we disclose information overseas, we take reasonable steps to make sure the recipient handles it in line with the APPs (APP 8).

Marketing

We only send newsletters and marketing with your consent, or where you would reasonably expect them. Every message has an easy way to unsubscribe (APP 7; *Spam Act 2003* (Cth)). We never use photos, stories or words from participants without their consent.

4. Keeping information safe

We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, change or disclosure (APP 11.1). These include:

- password-protected systems, with multi-factor authentication
- workers only see the information they need for their role
- confidentiality and privacy training for all workers, who also follow the NDIS Code of Conduct
- paper records kept locked away at our Head office
- secure deletion and shredding when information is no longer needed

We hold most information electronically in the systems listed in section 3, and a small amount on paper.

If there is a data breach

A data breach is when personal information is lost, or accessed or shared without permission.

We have a Data Breach Response Plan and follow these steps:

1. **Contain** the breach straight away to limit harm.
2. **Assess** it quickly. If we suspect an eligible data breach, we take all reasonable steps to finish our assessment within 30 days (Privacy Act s 26WH).
3. **Notify.** If the breach is likely to result in serious harm, we tell the Office of the Australian Information Commissioner (OAIC) and the people affected as soon as practicable (Privacy Act ss 26WK and 26WL). We explain what happened, what information was involved and what you can do to protect yourself.
4. **Review** what happened and fix the cause.

Even when the law does not require notification, we may still contact you if we think it will help you.

How long we keep information

We keep information only as long as we need it or the law requires. Then we securely destroy or de-identify it (APP 11.2).

Type of record	How long we keep it	Why
Health records, for someone under 18 when collected	Until they turn 25	ACT Health Records Act; NSW HRIP Act s 25
Health records, for an adult	7 years after the last service	ACT Health Records Act; NSW HRIP Act s 25
Health records, for someone who has died	The period above, and at least 5 years after their death	Our policy, to cover both ACT and NSW
Financial and invoicing records	7 years	*Corporations Act 2001* (Cth) s 286
Worker records	7 years, as required by the *Fair Work Act 2009* (Cth)	Fair Work Act s 535
Enquiries with no service provided	2 years after last contact	In case of a later enquiry

When we destroy or transfer a health record, we note the person's name, the period the record covers, and the date it was destroyed or who it went to. We keep this register permanently (ACT Health Records Act, Principle 4.2; NSW HRIP Act s 25).

5. Your rights

Seeing and correcting your information

You can ask to see the personal information we hold about you, and ask us to correct anything that is wrong, out of date or incomplete (APPs 12 and 13). You also have a right to access your health records under the *Health Records (Privacy and Access) Act 1997* (ACT) and the *Health Records and Information Privacy Act 2002* (NSW).

- Email or call us using the details in section 6.
- We will check your identity before giving you anything.
- We aim to respond within 30 days.
- It costs nothing to ask. If copying a large record costs us money, we will tell you the cost first.

- If we refuse access or a correction, we will tell you why in writing and how to complain.

You can withdraw your consent at any time, for example to photos, marketing or sharing with another provider. This may limit what we can offer, and we will tell you if it does.

Young people and people who act for them

Many of the young people we support are aged 14 to 17. We usually involve a parent or guardian in decisions about a young person's information. We also respect a young person's growing ability to make their own decisions, and we talk with them about their information wherever we can.
We will share information with a guardian, nominee or other authorised representative where the law allows it.

Automated decisions

We do not use computer programs to make decisions about you that could significantly affect your rights or interests. People make those decisions.
We use an AI tool to help with report writing. It brings together the shift notes our workers have written about a participant into a first draft. A team member then checks, edits and finalises every report before it is shared with anyone. The AI tool does not decide anything about your supports, funding or services.
We treat the AI tool like our other service providers (section 3). Our AI tool, Everbility, encrypts notes and does not use your information to train AI models.
If the way we use automated tools changes, we will update this policy first (APPs 1.7 to 1.9).

6. Questions and complaints

If you are unhappy with how we have handled your information, please tell us first. Making a complaint will never affect the services you receive.

How we handle a privacy complaint

1. Contact our Privacy Officer by email, phone, post or in person. Someone can make the complaint for you, such as a family member, support coordinator or advocate.
2. We acknowledge your complaint within 7 days.
3. We look into it, talk with you, and aim to give you a written response within 30 days.
4. If we need longer, we tell you why and when to expect an answer.

If you are not satisfied

You can take your complaint further. The OAIC generally expects you to give us 30 days to respond first.

Who	What they handle	Contact
Office of the Australian Information Commissioner (OAIC)	Privacy complaints under the Privacy Act	1300 363 992 · oaic.gov.au · GPO Box 5288, Sydney NSW 2001

Who	What they handle	Contact
ACT Human Rights Commission (Health Services Commissioner)	Complaints about ACT health records	(02) 6205 2222 · hrc.act.gov.au
Information and Privacy Commission NSW	Complaints about health information of NSW residents	1800 472 679 · ipc.nsw.gov.au
NDIS Quality and Safeguards Commission	Complaints about NDIS supports, including breaches of the NDIS Code of Conduct	1800 035 544 · ndiscommission.gov.au

Contact us

- **Privacy Officer:** Claire Golding, Operations Director
- **Business:** Goldlaine Pty Ltd trading as Ignition Gamers
- **Email:** hello@ignitiongamers.com.au
- **Phone:** 02 6130 0700
- **Address:** 2–4 Glassey Place, Spence ACT 2615

Changes to this policy

We review this policy at least once a year and when the law or our services change. The current version is always on our website. If we make significant changes, we will let you know by email. Last updated: 26/10/2026. This version replaces our previous privacy policy.