



'ATTENTIO' MOBILE APPLICATION AND WEBSITE
PRIVACY POLICY

1. We respect your privacy

- (a) Holding Space International Pty Ltd respects your right to privacy and is committed to safeguarding the privacy of our customers and software application users. We adhere to the National Privacy Principles established by the *Privacy Act 1988* (Cth). This policy sets out how we collect and treat your personal information.
- (b) "Personal information" is information we hold which is identifiable as being about you.
- (c) "Personal information" we hold is determined by the interface you are accessing.
- (d) Holding Space International Pty Ltd collects your personal information at the time of subscription.
- (e) The Account Holder and Supporter provide information for the Attentio Account of which they are a member.
- (f) Attentio stores data on their database in the Australian Region.

2. Collection of personal information

- (a) Holding Space International Pty Ltd will, at various times, receive and store personal information you enter onto our software application Attentio, provided to us directly or given to us in other forms.
- (b) You may provide basic information such as your name, phone number, address, and email address to enable us to send information, provide updates and process your product or service order. We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.



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- (c) Additionally, we may also collect any other information you provide while interacting with us.
 - (d) The Account User also provides date of birth to enable future versions of Attentio to respond to Account User needs.
 - (e) The Account User (the child or adult dependent) is the focus of Attentio Services, the Attentio Mobile Application, 'the App', and the Attentio Support Network Website, 'the Website'.
 - (f) The Account Holder creates the Account User profile for their child or adult dependent.
 - (g) The Account Holder may ask an additional person to help them create and manage the Account User profile and the Attentio Website. In this instance, the Account Holder has the sole responsibility for requesting and enforcing this additional person's confidentiality in regards to any and all information collected, recorded or shared using Attentio App and Attentio Website and pertaining to the App, the Website, the Account User, the Supporter and the Account Holder.
 - (h) All Content, Strategies and Features have been created and made available by the Account Holder to the Account User and the Supporter.
 - (i) The Account Holder has the sole responsibility of all content comprising their child or adult dependent's Account User profile.
 - (j) The Account Holder has the sole responsibility of selecting, creating and sharing the Account User profile with their dependent, the Account User, and required Supporter/s.
 - (k) The Account Holder shares Account User's information with the Account User and/or Supporter of their choice.
 - (l) The Account User, the child or adult dependent, accesses their Account User profile via the Account User App interface.
 - (m) The Supporter accesses the Account User profile, to which they have been given access by the Account Holder, via the Supporter App interface.



- (n) The Supporter has the option to provide feedback to the Account Holder pertaining to interactions between the Supporter and the Account User. This information is linked to the Account User profile and is visible to the Account Holder. The Account Holder maintains this information in the event the Supporter is no longer subscribed or linked to the Account User.
- (o) Attentio does not access any information pertaining to the Account User profile that the Account Holder selects, adds, controls or share with other members of their Attentio Account.
- (p) Attentio does not access the feedback about Supporter and Account User interactions that is provided by the Supporter and shared with the Account Holder
- (q) It is a condition of use, at the time of subscription, that each member of the Attentio Account, The Account Holder, the Account User and the Supporter, maintain confidentiality pertaining to ALL content in the Account User profile.
- (r) It is a condition of use, at the time of subscription, that no reference to identify the Account Holder, Account User or Supporter can be made by the Account Holder when using the Website.

3. Account Holder use of Personal Information pertaining to the Account User

- (a) The Attentio Mobile Application (the 'App') provides a platform for the Account Holder to record and store information about the Account User under the Account User's profile, and to customise tools to support the Account User who is either developing Executive Function and/or emotional regulation or living with disordered executive function and/or poor emotional regulation.
- (b) The Account Holder subscribes to Attentio App to create a minimum of one and a maximum of eight distinct Account User profiles.
- (c) Each Account User profile is purchased as an additional fee to the monthly Attentio Account subscription. This additional fee enables the



Account Holder to invite the Account User to access Attentio's features via the Account User interface.

- (d) The Account Holder has the ability to invite a Supporter to access the Account User's profile via the Supporter interface. Each Attentio Account comes with complimentary access for one Supporter. Additional Supporters can be purchased and linked to their selected Account User profiles with an additional fee to the monthly Attentio Account subscription.
- (e) Whilst the informant for each Account User profile is the Account Holder, all Supporters, the Account User and the Account Holder can view the Account User's profile.
- (f) Only the Account Holder can change the content of the Account User's profile.
- (g) The Supporter interface enables the Supporter to give feedback about their interactions with the Account User to the Account Holder.
- (h) The information selected, recorded and stored in Attentio by the Account Holder, is collated in '**General**', '**Routines**', '**Activity**' and '**SOS**'.
- (i) The information selected, recorded and stored in '**General**' by the Account Holder is based on the Account Holder's interpretation of knowledge about the Account User, at the time it is created.
 - (i) The information in 'General' is intended to provide information about the Account User's personal preferences, ways the Account User communicates, how the Account User processes information and sensory stimuli that elicit an intense response from the Account User.
 - (ii) Images used in 'General' may include images of the Account User. Images of the Account User are selected or captured and uploaded by the Account Holder to assist the Account User's understanding in 'General'.



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- (A) Information in '**General**', appearing as '**Likes and Dislikes**' pertains to the Account User's personal preferences and is specific to, and organised and labelled as, 'loves', 'likes', 'okay', 'dislikes' and 'loathes'. The Account Holder is responsible for all words, images and other documentation in each of the categories in 'Likes and Dislikes'.
- (B) Information in '**General**', appearing as '**Communication**', pertains to the Account User's personal communication preferences and is organised and labelled as, 'Speaking and Listening', 'Facial Expressions', 'Body Gestures', 'Hand Gestures', 'Reading and Writing', 'Drawing', 'Technology', and 'Eye Contact' to communication.
- (I). '**Speaking and Listening**' refers to how the Account User speaks and listens to communicate; and how the Support or Account Holder should speak and listen when communicating with the Account User;
- (II). '**Facial Expressions**' refers to how the Account User uses facial expressions and the meanings the Account User associates with the facial expression to communicate; and how the Support or Account Holder should use facial expressions when communicating with the Account User;
- (III). '**Body Gestures**' refers to how the Account User uses body gestures and the meanings the Account User associates with the body gestures to communicate; and how the Supporter or Account Holder should use body gestures when communicating with the Account User;
- (IV). '**Hand Gestures**' refers to how the Account User uses hand gestures and the meanings the Account User associates with the hand



- gestures to communicate; and how the Supporter or Account Holder should use hand gestures when communicating with the Account User;
- (V). **'Reading and Writing'** refers to the level of complexity used by the Account User when reading and writing; and how the Supporter or Account Holder can use reading and writing when interacting with the Account User;
- (VI). **'Drawing'** refers to how the Account User engages with drawing when communicating; and how the Supporter or Account Holder can use drawing to enhance communication with the Account User;
- (VII). **'Technology'** refers to the Account User's technology preferences, how the Account User uses the different technologies, and which technologies the Account User does not like to engage with; and how the Supporter or Account Holder can use technology to communicate with the Account User;
- (VIII). **'Eye Contact'** refers to how the Account User uses eye contact and the meanings the Account User associates with eye contact to communicate; and ways the Supporter or Account Holder should use or avoid eye contact when communicating with the Account User;
- (IX). The Account Holder is responsible for all words, images, video, audio and other documentation in each of the categories in 'Communication'.
- (C) Information in **'General'** appearing as **'Processing Time'**, pertains to factors influencing the Account User's ability to process information. The information is organised and labelled to guide the Supporter and Account Holder as to:



- (I). **'Number of instructions'** - how many instructions should be given at any time. This guides the Supporter or Account Holder to think about how they are breaking down a task to help the Account User increase their ability to follow instructions and complete a task successfully;
 - (II). **'Check for understanding'** - strategies that can be used by the Supporter or Account Holder so they know the Account User understands information they are receiving;
 - (III). **'Thinking Time'** - the amount of time the Supporter or Account Holder should stop talking and allow the Account User to think about the information they are receiving;
 - (IV). **'Time to complete tasks'**- the amount of time that is reasonable for the Account User to complete a task when the Account User's specific circumstances have been taken into account; and
 - (V). **'Time pressures'** - how the Account User is likely to respond if the Supporter or Account Holder interrupts them while they are completing a tasks either to check how the task is progressing or to check if the task has been completed.
 - (VI). The Account Holder is responsible for all words, images and other documentation in each of the categories in 'Processing Time'.
- (D) Information in **'General'** appearing as **'Triggers'**, pertains to a person, place, thing, or situation that elicits an intense emotional response from the Account User and is specific to, and organised and labelled as, 'Common triggers', 'Sensory triggers' and 'Other triggers'.



- (I). **'Common triggers'** are types of triggers that elicit an intense emotional response in many people, including the Account User;
 - (II). **'Sensory triggers'** pertain to the Account User's dislikes according to smell, sound, taste, proximal distance, touch and visual stimuli that elicit an intense emotional response;
 - (III). **'Other triggers'** pertain to 'Human triggers', 'Animal triggers' and 'Situation triggers' that elicit an intense emotional response from the Account User.
 - (IV). The Account Holder is responsible for all words, images and other documentation in each of these categories.
- (d) The information selected, recorded and stored in Attentio by the Account Holder in **'Routines'** is intended to provide the Account User with an overview of what the Account Holder expects them to do in the morning, afternoon and/or evening.
 - (i) An activity in the Account User's routine may describe a private requirement;
 - (ii) Activities that take place during the the morning, afternoon and/or evening are listed in the appropriate time of day;
 - (iii) The duration of time is allocated to each activity in the form of a timer to let the Account User know how much time they have to complete the activity;
 - (iv) The timer can be turned on or off by the Account Holder;
 - (v) The Account Holder is responsible for all words, images, video, audio and other documentation selected and/or uploaded in each of these categories.
- (e) The information selected, recorded and stored in Attentio by the Account Holder in **'Activity'** is intended to provide you with 'Details' of a specific activity, and a 'Checklist' to prepare for the activity.



- (i) In '**Details**', the Account Holder is able to provide information about what to expect in relation to the Activity
 - (A) a '**Title**' for the activity;
 - (B) general descriptions of the '**People**' expected to be at the activity;
 - (C) how people are likely to move, '**Movement**', at the activity;
 - (D) weather conditions, '**Climate**', that might be experienced at the activity;
 - (E) the general '**Mood**' or atmosphere or emotions that might be experienced at different times during the activity;
 - (F) how the Account User will travel, '**Transport**', to, during or away from the activity;
 - (G) other information pertaining to the activity, '**Reminder**', that the Account User needs to remember;
 - (H) The Account Holder is responsible for all words, images, video, audio and other documentation selected and/or uploaded in Activity 'Details'.
- (ii) In '**Checklist**', the Account Holder also has the option of creating a 'Checklist' directly associated with the specified Activity.
 - (A) The checklist is intended to be a method to help the Account User keep track of what needs to be done and when it is done;
 - (B) The Account Holder is responsible for all words, images, video, audio and other documentation selected and/or uploaded in Activity 'Checklist'.
- (f) The information selected, recorded and stored in Attentio by the Account Holder in '**SOS**' is intended to provide information about how you demonstrate '**Signs of Distress**' and being '**Overwhelmed**' and what the Supporter or the Account Holder can do to support you while you are in that state of being. 'SOS' is also intended to provide information about considerations that need to be regarded when supporting you to



'Returning to calm' and general **'Tips for Support Person'** that can be utilised by the Supporter or the Account Holder any time they are interacting with you.

- (i) In **'Signs of Distress'** in SOS, 'Signs' and 'Strategies' are intended to provide easily accessible information to the Supporter or the Account Holder to give the Account User the best support possible:
 - (A) **'Signs'** are descriptions of how you show you are irritated or distressed.
 - (B) **'Strategies'** are recommended instructions that are known to alleviate your stress and regulate your emotions that could be applied by the Supporter or Account Holder.
 - (C) The AccountHolder is responsible for all words, images and other documentation selected or uploaded in SOS 'Signs of Distress'.
- (ii) In **'Overwhelmed'** in SOS, 'Signs' and 'Strategies' are intended to provide easily accessible information to the Supporter and/or the Account Holder to give the Account User the best support possible:
 - (A) 'Signs' are descriptions of how you show you are overwhelmed and are having difficulty regulating your emotions
 - (B) 'Strategies' are recommended instructions for the Supporter or Account Holder to keep you safe and actions they can take so you can begin to regulate your emotions.
 - (C) The AccountHolder is responsible for all words, images and other documentation selected or uploaded in SOS 'Signs of Distress'.
- (iii) In 'Return to Calm' in SOS, information is guided by consideration of **'Amount of time usually needed'**, **'Proximity'**, **'Calming words'**, **'Reassurance'**, **'Calming body movements'**, and **'Introduction of item'**.



- (A) **'Amount of time usually needed'** refers to how long the Account User's state of overwhelm may last. It is intended to inform the Supporter or Account Holder whether the calming process takes a short time (usually less than 30 minutes) or a long time (longer than 30 minutes). Knowing the amount of time usually needed guides the Supporter or Account Holder as to how they can control their behaviours and emotions while supporting the Account User;
 - (B) **'Proximity'** refers to the physical closeness preferred by the Account User when being supported by the Supporter or Account Holder;
 - (C) **'Calming words'** refers to the types of words that should be used by the Supporter or Account Holder. It may also include words they shouldn't use because these words will upset you and add to the escalation;
 - (D) **'Reassurance'** refers to phrases the Supporter or Account Holder should use to let you know you are safe and have the time you need to return to calm;
 - (E) **'Calming body movements'** refers to physical movements, including breathing techniques, the Supporter or Account Holder can do with you to help you return to calm;
 - (F) The Account Holder is responsible for all words, images and other documentation selected or uploaded in SOS 'Return to Calm'.
- (iv) In **'Tips for support person'** in SOS, the Account Holder describes words and behaviours the help the Account User have positive experiences.
- (A) The **'Tips'** provided but the Account Holder should be used by the Supporter or Account Holder in their typical interactions with the Account User;
 - (B) The Account Holder is responsible for all words, images and other documentation selected or uploaded.



4. Supporter feedback attached to the Account User's profile

- (a) The Attentio Mobile Application (the 'App') provides a platform for the Supporter to provide the Account Holder with notes about their interactions with the Account User.
 - (i) The information written by the Supporter is attached to the Account User's profile;
 - (ii) The information written by the Supporter is visible to the Account Holder;
 - (iii) The feedback provided by the Supporter remains attached to the Account User profile and visible to the Account Holder after the Supporter is no longer subscribed and/or linked to the Account User.
 - (iv) The Supporter is responsible for all content related to the Account User that are written, saved and shared with the Account Holder.

6. How we collect your personal information

- (a) Other than the information provided by the Account Holder or the Supporter, Holding Space International Pty Ltd collects personal information from you in a variety of ways, including when you interact with us electronically, in writing or in person, when you access our software application, when you access our website and when we provide our services to you. We may receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.

7. Use of your personal information

- (a) Holding Space International Pty Ltd may use personal information collected from you to provide you with information, updates and our services. We may also make you aware of new and additional products, services and opportunities available to you. We may use your personal information to improve our products and services and better understand your needs.
- (b) The Application may make third party social media features available to its users. We cannot ensure the security of any information you choose to make public in a social media feature. Also, we cannot ensure that



parties who have access to such publicly available information will respect your privacy.

- (c) Holding Space International Pty Ltd may contact you by a variety of measures including, but not limited to telephone, email, sms or mail.

8. Disclosure of your personal information

- (a) We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Personal information is only supplied to a third party when it is required for the delivery of our services.
- (b) We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
- (c) We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of Holding Space International Pty Ltd, its application, website and customers or third parties.
- (d) Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia.
- (e) If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.
- (f) By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.

9. Security of your personal information



- (a) Holding Space International Pty Ltd is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.
- (b) The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

10. Access to your personal information

- (a) You may request details of personal information that we hold about you in accordance with the provisions of the *Privacy Act* 1988(Cth). A small administrative fee may be payable for the provision of information. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at admin@attentio.com.au.
- (b) We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the *Privacy Act*.

11. Complaints about privacy

- (a) If you have any complaints about our privacy practices, please feel free to send in details of your complaints to PO Box 342, Trinity Beach, Queensland, 4879. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

12. Op out right

- (a) You can stop all collection of information by the Application easily by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

13. Changes to Privacy Policy



- (a) Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board. Please check back from time to time to review our Privacy Policy.

14. Software Application

- (a) **When you use our Application or Website**

When you come to our Application or Website, we may collect certain information such as mobile unique device ID, the IP address of your mobile device, mobile operating system, the type of mobile internet browsers you use, and information about the way you use the Application or Website. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

- (b) **Cookies**

We may from time to time use cookies on our software application. Cookies are very small files which a website uses to identify you when you come back to the application and to store details about your use of the application. Cookies are not malicious programs that access or damage your computer, tablet or smartphone. Most devices automatically accept cookies but you can choose to reject cookies by changing your device settings. However, this may prevent you from taking full advantage of our application.

- (c) **Automatic collection**

The software Application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use the Application.

- (d) **Third parties**

Our software application may from time to time have links to other applications or websites not owned or controlled by us. These links are meant for your convenience only. Links to third party applications and websites do not constitute sponsorship or endorsement or approval of these third parties. Please be aware that Holding Space International Pty



Ltd is not responsible for the privacy practises of other such applications or websites. We encourage our users to be aware, when they leave our application or website, to read the privacy statements of each and every application or website that collects personal identifiable information.

(e) Geo-location

When you visit the mobile application, we may use GPS technology (or other similar technology) to determine your current location in order to determine the city you are located within and display a location map with relevant advertisements. We will not share your current location with other users or partners.

ATTENTIO is owned and operated by:

Holding Space International Pty Ltd

ABN 51540701395

Director's contact email: admin@attentio.com.au

Holding Space International Pty Ltd

'Attentio'

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