

**PUBLIC-FACING POLICY**

BRAVE MIND PROJECT GROUP PRIVACY POLICY

BMP-POL-PRV-002 | VERSION 1.0 | PUBLIC-FACING POLICY

Document title	Brave Mind Project Group Privacy Policy
Document ID	BMP-POL-PRV-002
Version	1.0
Status	Controlled document - active public-facing policy
Document owner	The Brave Mind Project Pty Ltd
Applies to	The Brave Mind Project Pty Ltd, FIFO Mind Connect, Business Mind Connect and future BMP-operated training, education and business products unless a specific policy applies. Man Counsellor has a separate service-specific privacy policy.
Effective date	13 June 2026
Next review date	13 June 2027
Classification	Public-facing policy

ORGANISATIONAL APPLICABILITY

This public policy explains how The Brave Mind Project Pty Ltd handles personal information across its group-level operations, FIFO Mind Connect, Business Mind Connect and future training, education and business products. Man Counsellor maintains a separate service-specific privacy policy because its counselling and wellbeing services may involve additional handling of sensitive and health information.

APPROVAL SIGN-OFF

Approved by	Phillip Armstrong	Role	Co-Managing Director
Signature		Approval date	13 June 2026

CONTROLLED DOCUMENT | PUBLIC-FACING POLICY

1. Our commitment to privacy

The Brave Mind Project Pty Ltd (BMP) is committed to handling personal information responsibly. This policy explains how BMP and its covered business lines collect, use, store, disclose and manage personal information. BMP seeks to manage personal information consistently with applicable Australian privacy requirements, including the Australian Privacy Principles under the Privacy Act 1988 (Cth), where those requirements apply.

2. Business lines covered by this policy

- The Brave Mind Project Pty Ltd - group operations, partnerships, advocacy, product development and general enquiries.
- FIFO Mind Connect - training, licensing, implementation support and business enquiries.
- Business Mind Connect - training, resources, implementation support and business enquiries.
- Future BMP-operated training, education and business products where a separate privacy policy has not been published.

Man Counsellor has a separate public-facing privacy policy for its counselling, coaching and wellbeing services.

3. Information we may collect

Depending on how a person interacts with BMP or a covered business line, we may collect:

- Name, role, organisation and contact details.
- Information submitted through enquiry forms, email, phone calls, meetings or other communications.
- Business information relevant to a proposal, licence, service arrangement or implementation discussion.
- Training registration, participation, completion or certification information where applicable.
- Billing, contract and administrative information where applicable.
- Marketing preferences and communication history.
- Technical information such as IP address, browser, device information and session metadata where collected by websites or service platforms.

FIFO Mind Connect and Business Mind Connect are not designed to collect clinical information through their public websites or training products. People should avoid submitting sensitive personal or health information through general enquiry forms unless it is necessary for the enquiry.

4. How information is collected

- When a person submits an enquiry, requests information or communicates with us.
- When an organisation discusses, purchases or implements a product or service.
- When a learner registers for or completes training, where learner-level records are required.
- When a person uses a BMP website, form, email link or connected digital platform.
- From authorised third parties where lawful and reasonably necessary.

5. Why we collect and use information

- Respond to enquiries and communicate with stakeholders.
- Prepare proposals, agreements and implementation arrangements.
- Deliver and administer training, resources, licences and support.
- Maintain appropriate completion, certification, billing and operational records where required.
- Improve products, websites and service delivery through proportionate and privacy-conscious analysis.
- Manage safety, quality, complaints, legal obligations and business operations.
- Send relevant updates or marketing communications where permitted, with a practical option to opt out.

6. Disclosure and service providers

BMP does not sell, rent or trade personal information. We may disclose information where reasonably necessary, authorised or required by law, including to service providers that support websites, forms, customer relationship management, communications, document storage, automation, video meetings, accounting, payments, learning

delivery or technology operations. We may also disclose information to professional advisers, insurers, regulators or other parties where reasonably necessary and appropriately authorised or required.

7. Overseas processing

Some technology service providers may store or process information in Australia or overseas. BMP takes reasonable steps appropriate to the circumstances when selecting and using service providers. Third-party platforms may have their own privacy practices and policies.

8. Storage, security and retention

BMP uses reasonable safeguards appropriate to the circumstances to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. Access is restricted to authorised people who require the information for their role. Information is retained and disposed of in accordance with applicable legal, contractual and operational requirements.

9. Website analytics, cookies and links

BMP websites may use analytics, cookies or similar technologies to understand website use and improve performance. Third-party websites and services linked from our websites have their own privacy practices. People should review those policies separately where relevant.

10. AI-supported and digital tools

BMP may use digital or AI-supported tools for limited administrative, operational, drafting or service-improvement purposes. Identifying client information, sensitive personal information and confidential case material will not be intentionally entered into generative AI tools unless an approved process, safeguards and any required consent are in place.

11. Access, correction and privacy concerns

A person may request access to personal information held about them, ask for inaccurate information to be corrected or raise a privacy concern. BMP may need to verify identity before releasing or updating information and may apply lawful exceptions where relevant.

Privacy enquiries and requests may be directed to: coo@fifomindconnect.com.au

12. Data breaches

Suspected privacy incidents should be reported promptly. BMP will assess and respond to privacy incidents in accordance with applicable requirements, including notification obligations where relevant.

13. Updates to this policy

This policy may be updated to reflect changes in law, technology, products, service delivery or operational practices. The current approved version should be published or otherwise made available through appropriate BMP channels.

14. Related policies

- MC-POL-002 Man Counsellor Privacy Policy.
- BMP-POL-PRV-001 Privacy, Confidentiality and Personal Information Management Policy and Procedure.

15. Reference framework

OAIC - Australian Privacy Principles: <https://www.oaic.gov.au/privacy/australian-privacy-principles>

OAIC - Notifiable Data Breaches: <https://www.oaic.gov.au/privacy/notifiable-data-breaches>