

Illumination Transformation Ltd

Privacy & Data Protection Policy

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This policy explains how Illumination Transformation Ltd collects, uses, stores, protects and discloses personal information through its website and related activities.

1. Our commitment

We are committed to handling personal information carefully, respectfully and in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. We recognise that some information provided to us may be highly personal or sensitive, including information connected to abuse, trauma, mental health, family circumstances, safety concerns, support needs or lived experience. We aim to collect only what is reasonably necessary, use it only for legitimate purposes, and protect it with appropriate administrative, technical and physical safeguards. We recognise that some people who use this website may be in circumstances where their safety, privacy or freedom to access information is being monitored or controlled by another person. We take this into account in how we handle, store and protect personal information.

2. Scope

This policy applies to information collected through the website, online forms, newsletters, campaign pages, donation tools, contact requests, partner enquiries, story submissions, surveys, volunteer or employment applications, event registrations, email correspondence, social media interactions where routed back into our systems, and any other related digital or administrative channels used by Illumination Transformation Ltd. This policy also applies to the Healing Hub member registration area and to practitioners, organisations and individuals who engage with IT through the Light List directory or professional education programs.

3. The types of information we may collect

Depending on how you interact with us, we may collect your name, preferred name, email address, phone number, suburb or state, donation details, transaction records, communication preferences, account or login details, support enquiry details, volunteer or partnership information, and information you choose to provide in free-text responses. We may also collect technical information such as IP address, browser type, device information, website activity logs, cookies and analytics data. If you submit forms about personal experiences, we may also collect sensitive information, such as information about health, wellbeing, trauma, family violence, coercive control, cultural or community context, or the identity or relationship of the person causing harm, where you voluntarily provide that information. Where you register for the Healing Hub, we may also collect account credentials and engagement information such as content accessed or preferences selected. We note that registration for the Healing Hub is itself information that carries elevated sensitivity, as it may indicate lived experience of narcissistic abuse, coercive control or related trauma, and we treat it accordingly. Where you engage with IT as a practitioner, organisation or professional education partner, we may collect professional details such as your practice name, professional registration, business contact details, area of specialisation and billing information.

4. Information collected from website forms

The website may include contact, sign-up, newsletter, donation, login, Healing Hub, Share Your Story, Partner With Us, volunteer, collaboration or other intake forms. Those forms may ask for identifying information, contact details, and information about your reason for contacting us. If a form requests contextual information, for example the relationship of a person causing harm or the kind of support or information you are seeking, we collect that information to better understand needs, route enquiries appropriately, improve services and tailor communications. When you submit a story, personal account or lived experience through a website form, we treat that submission as sensitive information and will not publish it in identifiable form without your express permission. If you are concerned about your browsing history or online safety, we encourage you to review the browsing safety information available on our website, including guidance on clearing your history or using private browsing

5. How we collect information

We collect information directly from you when you enter it on the website, donate, subscribe, create an account, request support information, submit a story, email us, complete a survey, join a waiting list, register for an event, apply to volunteer or work with us, or otherwise contact us. We may also collect information automatically through website technologies such as cookies, pixels, server logs and analytics tools. In some cases, we may receive information from payment providers, fundraising platforms, IT providers, referral partners, public sources or people acting with your authority. Where information about you is provided by a support person, referral partner, professional or trusted third party acting in your interest, we will handle that information with the same level of care and confidentiality as information you provide directly

6. Why we collect and use personal information

We collect and use personal information to operate the website; communicate with you; respond to enquiries; provide information, updates and resources; manage memberships or login areas; process donations and issue receipts; administer fundraising and events; assess partnership, volunteer or collaboration opportunities; safeguard users and the organisation; improve our programs, content and services; maintain records; comply with legal obligations; and manage complaints, incidents, access requests or disputes. Where you engage with IT as a practitioner or professional education partner, we may use your information to operate and administer the Light List directory, manage your listing, process service fees, facilitate referrals, and communicate with you about your participation. We may also use de-identified or aggregated information drawn from website and platform activity to understand community need, inform content development, and support IT's advocacy and awareness activities

7. Sensitive information

We will only collect sensitive information where it is reasonably necessary for our functions and activities, where you voluntarily provide it, or where otherwise permitted by law. Because we work in a trauma-informed context, people may disclose highly sensitive material in open text fields or correspondence even where it is not specifically requested. Where sensitive information is provided, we may use it to respond appropriately, assess safety, support referral decisions, manage safeguarding, or understand community needs. Where IT becomes aware, through any communication channel, of an immediate or imminent risk of serious harm to a person, we may disclose relevant information to emergency services or appropriate authorities without consent, where permitted or required by law. IT has implemented safeguarding measures including automated responses that surface crisis support resources where distress signals are identified in platform interactions. These measures exist solely to protect user safety and are not used for any other purpose.

8. Anonymity and pseudonyms

Where lawful and practicable, you may contact us or access general website information anonymously or using a pseudonym. We recognise that for some people, using a pseudonym or accessing information anonymously is a safety consideration rather than simply a preference, and we respect that need. However, anonymity may limit our ability to respond to you, process a donation, provide follow-up, manage access to restricted resources, or address safeguarding concerns.

9. Cookies, pixels and analytics

The website may use cookies and similar technologies to remember preferences, understand traffic, improve website performance, measure engagement, protect against abuse, and support campaign or fundraising effectiveness. Analytics tools may collect information such as pages viewed, referral source, approximate location, session duration, clicks and device type. You can usually manage cookies through your browser settings, although disabling them may affect website functionality. If you are concerned that your browsing activity may be visible to another person, we encourage you to use a private or incognito browsing window when visiting this website, and to review the browsing safety guidance available on our website.

10. Direct marketing and communications

We may send you updates, newsletters, campaign messages, event information, fundraising communications or service-related notices if you have subscribed, engaged with us, donated, registered, or where otherwise permitted by law. You can unsubscribe from marketing communications at any time by using the unsubscribe option or contacting us directly. We recognise that receiving communications from IT may carry safety implications for some users, and we encourage anyone with concerns about communication privacy to contact us directly so we can adjust how and whether we communicate with you. We may still send non-marketing administrative or transactional messages where necessary.

11. Disclosure of personal information

We may disclose personal information to our staff, authorised volunteers, contractors and service providers who need it to perform legitimate functions; to website hosts, cloud storage providers, CRM providers, analytics providers, IT support providers, payment processors, email distribution services, legal or professional advisers, insurers, auditors and regulators; and where required or authorised by law. We may also disclose information where reasonably necessary to lessen or prevent a serious threat to life, health or safety, investigate unlawful activity, respond to complaints, protect rights or property, or enforce our terms and policies. Where IT facilitates a connection or referral between a user and a Light List practitioner, only the minimum information necessary to enable that connection will be shared, and survivor data will not be disclosed to practitioners beyond what is required for that specific purpose. Personal information collected from survivors and Healing Hub users is stored and managed separately from information collected from practitioners, commercial partners and professional education participants. We do not sell, rent or trade personal information to any third party for commercial purposes.

12. Overseas disclosure

Some of our digital systems or service providers may store data in, or permit access from, countries outside Australia, including where cloud, email, payment, analytics, CRM, form or backup providers use global infrastructure. Overseas data handling may occur in connection with website hosting, email distribution, analytics, payment processing, cloud document storage, customer relationship management systems, or form and survey platforms. Where this occurs, we will take reasonable steps to ensure appropriate safeguards apply. Because provider arrangements may change over time, we do not guarantee that all data will remain solely in Australia

13. Storage and security

We store information in electronic systems, including website databases, email systems, cloud storage, document repositories, donor or CRM systems, form platforms and backups, and occasionally in limited physical records where necessary. We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. Safeguards may include role-based access controls, password protection, multi-factor authentication where available, secure cloud platforms, encryption in transit, device security, security monitoring, confidentiality obligations, limited access practices, staff and volunteer training, and secure disposal processes. Information connected to abuse, trauma, lived experience or safeguarding disclosures is subject to enhanced access controls and is accessible only to those with a specific and documented need. Where a user requests deletion of their account or personal information on safety grounds, IT will treat that request as a priority and action it as quickly as reasonably practicable.

14. Data minimisation and access controls

We aim to limit the collection and retention of information to what is reasonably necessary. Access to personal information should be restricted to people who need it for their role. Sensitive submissions, survivor disclosures, incident information and safeguarding records should be handled on a strict need-to-know basis and, where possible, stored separately or with enhanced access controls. Where information is collected from practitioners or professional partners for the Light List directory or professional education programs, collection is limited to what is necessary for those specific purposes and is not used for any other purpose without separate notice and consent.

15. Retention and destruction

We keep personal information only for as long as reasonably necessary for the purpose for which it was collected, and for related legal, regulatory, safeguarding, insurance, complaint-handling, governance and operational reasons. Retention periods may differ depending on the nature and sensitivity of the information. When information is no longer required, we will take reasonable steps to securely destroy it or de-identify it. As a general guide, Healing Hub registration and account data is retained for as long as your account is active and for a reasonable period after closure to manage any outstanding matters. Sensitive form submissions and safeguarding-related correspondence are retained in accordance with our legal and safeguarding obligations, which may require retention for a minimum of seven years. You may request deletion of your personal information at any time by contacting us, and where a deletion request is made on safety grounds it will be treated as a priority.

16. Data quality

We take reasonable steps to ensure the personal information we hold is accurate, up to date, complete and relevant, having regard to the purpose for which it is used. We rely on you to let us know if your details change or if you believe information we hold is inaccurate. Where you need to update your contact details or account information urgently for safety reasons, please contact us directly and we will prioritise that request.

17. Access and correction

You may request access to personal information we hold about you and request correction of inaccurate, incomplete or outdated information, subject to any lawful exceptions. Requests should be made in writing so we can verify your identity and respond appropriately. We aim to respond to access and correction requests within 30 days of receiving sufficient information to verify your identity and assess the request. In some cases we may need to refuse or limit access where permitted by law, including where access would unreasonably affect another person's privacy, prejudice an investigation, reveal evaluative decision-making in limited circumstances, or create a serious threat to health or safety. Where an access or correction request is made on safety grounds, we will treat it as a priority and respond as quickly as reasonably practicable.

18. Data breaches

If we become aware of a suspected or actual data breach, we will assess it promptly, contain it where possible, investigate impact, and take appropriate remedial action. If we are legally required to notify affected individuals or a regulator, we will do so in accordance with applicable law and our incident response processes. We recognise that a data breach involving information connected to abuse, trauma or lived experience carries heightened risk for affected individuals, including potential safety implications, and we treat any such breach with the utmost urgency. We aim to assess suspected breaches promptly and to notify affected individuals and the Office of the Australian Information Commissioner as quickly as practicable where notification is required by law.

19. Third-party services

Our website and forms may be supported by third-party providers for hosting, analytics, payments, forms, newsletters, customer relationship management, document storage, social content, or embedded functionality. Those providers may process personal information on our behalf in accordance with their own infrastructure and security arrangements. Where third-party platforms are used, users may also be subject to those providers' own terms and privacy notices. If you have concerns about how a specific third-party provider handles your personal information, you may contact us and we will provide whatever information we are reasonably able to share about the providers we use and the safeguards we have in place

20. Public posts, testimonials and stories

Please be aware that information you choose to publish publicly through comments, testimonials, social media interactions, campaign pages or approved story publication may be visible to others. Before we publish personal stories or identifiable lived experience content, we may edit, anonymise, de-identify or seek confirmation of consent, depending on the context and the level of risk. Where lived experience content relates to abuse, coercive control or family violence, IT applies an elevated standard of anonymisation to minimise any risk of identification, regardless of whether the contributor has consented to publication in identifiable form. If you have previously consented to publication of your story or personal account and wish to withdraw that consent, please contact us and we will remove or further anonymise the content as quickly as reasonably practicable.

21. Complaints

If you believe we have handled your personal information in a way that is inconsistent with this policy or applicable law, you may contact us and we will review the matter. We aim to acknowledge complaints within five business days and to resolve them within 30 days, keeping you informed of progress where a matter requires more time. We may request further information to properly assess your complaint. If you are dissatisfied with our response, you may have the right to complain to the Office of the Australian Information Commissioner. We handle all privacy complaints with sensitivity and care, recognising that the act of raising a concern may itself be difficult for people who have experienced abuse, trauma or coercive control

22. Contact details

Privacy enquiries, access requests, correction requests, deletion requests and complaints may be directed to our Privacy Officer at reachout@illuminationtransformation.org.au. We aim to respond to all privacy-related communications within five business days.

23. Short public website privacy notice

We respect your privacy. When you use our website, contact us, sign up, register for the Healing Hub, donate, submit a form, or engage with our services, we may collect personal information such as your name, contact details, donation information, and any information you choose to provide. Registration for the Healing Hub is treated as sensitive information and handled with elevated care. We may also collect limited technical information such as device, browser and website usage data. We use this information to respond to enquiries, provide services and updates, process donations, improve our website, protect users, and meet legal obligations. Some information may be handled by trusted third-party service providers that help us operate our website and systems. We take reasonable steps to protect personal information and do not sell your personal information. If you are concerned about your browsing safety or privacy, please review the browsing safety guidance on our website. For more information, or to request access, correction or deletion, contact reachout@illuminationtransformation.org.au or read our full Privacy and Data Protection Policy.

24. Changes to this policy

We may update this policy from time to time to reflect changes to the website, our operations, legal requirements or our service providers. Where changes are material, particularly changes affecting how sensitive information is handled, how long data is retained, or how disclosures are made, we will notify registered users by email before those changes take effect. The current version should be published on the website with the effective date.

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