

Cultivate Survey Participant Collection Notice

Applies to: C38 Surveys and Pulse Surveys

Version: 1.0

Effective date: 28 July 2026

Our commitment

Cultivate respects your privacy and is committed to handling personal information openly, securely and in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

Before you begin

Your organisation has engaged Cultivate to conduct this survey as part of its Workforce Intelligence, leadership development and organisational improvement activities.

This Collection Notice explains:

- what information is collected through the survey;
- how your responses will be used;
- how anonymity and confidentiality are protected;
- how optional segmentation information is handled;
- when results will or will not be reported;
- how written comments are reviewed and presented; and
- where you can obtain further privacy information.

Please read this notice before commencing the survey.

1. Who is collecting the information?

Your survey responses are collected by:

CultivateXP Pty Ltd, trading as **Cultivate**.

Ms Neha Dharma, Privacy Officer

Email: info@cultivatexp.com.au

Telephone: 02 8448 3200

Address: Level 15, Station Street East, Parramatta NSW 2150

Website: www.cultivateXP.com.au

Cultivate is conducting the survey for your organisation.

Your organisation may have provided Cultivate with limited organisational information needed to distribute the survey, administer participation and prepare authorised reports.

Australian Privacy Principle 5 requires organisations collecting personal information to take reasonable steps to notify individuals about matters including the identity of the collector, the purposes of collection, usual disclosures, consequences of not providing information, access to the privacy policy and likely overseas disclosures.

2. Purpose of the survey

The survey is designed to provide objective insight into workforce conditions and employee experience.

Depending on the survey being completed, the results may be used to:

- establish or update the organisation's Workforce Intelligence;
- calculate the Cultivate Engagement Index and related measures;
- understand employee experience across the organisation;
- identify leadership and engagement strengths;
- identify opportunities for improvement;
- assess leadership consistency across teams;
- establish organisational, team or manager-related baselines;
- compare results over time;
- measure progress following manager development or workplace action;
- identify organisational priorities;
- support evidence-based leadership decisions; and
- prepare authorised reports and recommendations.

C38 Survey

The C38 Survey is a broader strategic measure of workforce conditions and employee experience. It may be administered at baseline and repeated periodically to assess organisational progress and trends.

Pulse Survey

A Pulse Survey is a shorter, targeted measure generally used before or after a particular Cultivate learning unit, Manager Action Program or improvement initiative. It helps assess current experience and whether meaningful change has occurred.

3. What information will be collected?

Depending on the survey design agreed with your organisation, Cultivate may collect:

- your ratings and responses to survey questions;
- your opinions and perceptions about your work, team, manager and organisation;

- written comments you choose to provide;
- broad organisational or demographic information;
- the date and time the survey is completed;
- completion status;
- a survey response token or unique survey link;
- technical information needed to operate and protect the survey; and
- information voluntarily included in your responses.

Cultivate does not ordinarily ask for your name

The standard C38 and Pulse Surveys do **not ordinarily require you to provide your name**.

You should not include your name, another person's name or other unnecessary identifying details in a written comment.

4. Is the survey anonymous?

Cultivate designs its standard workforce surveys so that individual participants are not identified in ordinary reporting.

This means:

- your name is not ordinarily collected as part of your survey response;
- your individual responses are not ordinarily shown to your manager;
- reports generally present combined or aggregated results;
- small groups may be suppressed or combined;
- identifying details may be removed from written comments; and
- access to survey data is restricted.

Australian privacy guidance distinguishes true anonymity from confidentiality. True anonymity means the individual cannot be identified at the time of the interaction or later. A survey may therefore be confidential or pseudonymous rather than absolutely anonymous where technical or organisational information could potentially enable identification in limited circumstances.

What Cultivate means by “anonymous survey reporting”

In this notice, anonymous reporting means that Cultivate will not ordinarily identify you in reports provided to your organisation or deliberately connect your name with your individual answers.

However, absolute anonymity cannot be guaranteed in every circumstance because:

- your organisation may use unique survey links to manage distribution and completion;
- Cultivate may process technical records to prevent duplicate submissions or protect system security;

- a combination of optional segmentation responses may identify a person in a very small group;
- the wording of a written comment may identify you or another person; or
- disclosure may be required or authorised by law or necessary to address a serious and imminent risk.

Cultivate will not ordinarily use technical information or response tokens to identify how a particular individual answered the survey.

5. Survey links, response tokens and technical information

Cultivate may use a unique survey link or response token to:

- provide access to the correct survey;
- prevent multiple submissions;
- monitor overall participation;
- send reminders to people who have not yet completed the survey, where the system supports this;
- maintain the integrity of the survey;
- diagnose technical issues; and
- protect against misuse or security threats.

Where practicable, participation-status information is kept separate from the substantive survey responses.

Cultivate may also collect technical information such as:

- IP address;
- browser and device information;
- date and time of access;
- error and diagnostic records; and
- security logs.

This information is used for survey administration, security and technical support. It is not ordinarily included in client reports or used to identify an individual's answers.

6. Reporting thresholds

Cultivate applies minimum reporting thresholds to reduce the risk that individual participants can be identified from small-group results.

This means Cultivate will not ordinarily produce a separate numerical report for a team, demographic category or other group unless at least the minimum number of valid responses has been received.

Where the threshold is not met, Cultivate may:

- combine the group with a larger reporting category;
- include the responses only in the overall organisational result;
- suppress the group result;
- defer reporting until sufficient responses are available; or
- exclude the result from comparative analysis.

Reporting thresholds do not eliminate every identification risk

Even where a minimum threshold is met, identification may still be possible where:

- a group has a distinctive composition;
- only one person occupies a particular role;
- several segmentation categories are combined;
- the subject matter of a response reveals the participant; or
- a written comment contains identifying details.

Cultivate may therefore apply a higher threshold or additional suppression where reasonably necessary.

The final threshold and suppression methodology should be confirmed before this notice is published and applied consistently across the C38 and Pulse Survey reporting framework.

7. How written comments are handled

Some surveys may include optional free-text questions.

Written comments can provide valuable context, but they also create a greater risk of identifying the participant or another person.

Before submitting a comment

Please do not include:

- your name;
- another person's name;
- initials or a distinctive title that identifies someone;
- unnecessary information about health, religion, ethnicity or another sensitive matter;
- confidential client or customer information;
- unsupported allegations of misconduct;

- offensive, threatening or defamatory material; or
- information unrelated to the survey question.

Review and moderation

Before comments are included in a client report, Cultivate may:

- review them for privacy and confidentiality risks;
- remove names or other identifying details;
- correct obvious spelling or grammatical errors without changing the meaning;
- redact sensitive or unnecessary personal information;
- paraphrase or summarise a comment;
- group comments into themes;
- quote only part of a comment;
- delay reporting the comment;
- refer a serious concern for appropriate consideration where permitted or required; or
- withhold the comment entirely.

Written comments are not guaranteed to be reproduced verbatim

Cultivate may present:

- selected de-identified comments;
- theme summaries;
- representative extracts;
- percentages or frequencies of themes; or
- an overall qualitative analysis.

A comment will not necessarily appear in the final report merely because it was submitted.

Comments about identifiable people

Cultivate will not ordinarily provide an unedited comment that identifies or could reasonably identify:

- the participant;
- a manager;
- another employee; or
- another individual.

Where the underlying issue is relevant, Cultivate may report the general theme without identifying the people involved.

8. Serious workplace, safety or legal concerns

The C38 and Pulse Surveys are intended to measure workforce conditions and employee experience. They are not designed to operate as:

- a formal grievance process;
- a whistleblower reporting channel;
- an emergency reporting system;
- a work health and safety incident-reporting process;
- a bullying or harassment investigation;
- a clinical or counselling service; or
- a substitute for your organisation's formal complaint procedures.

Where a response indicates:

- a serious or imminent threat to health or safety;
- suspected criminal conduct;
- serious abuse or misconduct;
- a legal reporting obligation; or
- another matter requiring urgent intervention,

Cultivate may disclose relevant information to an appropriately authorised person, emergency service, regulator or other body where disclosure is required or permitted by law.

For an urgent or serious workplace concern, use your organisation's designated grievance, whistleblower, safety or emergency process rather than relying solely on this survey.

9. Who will receive the results?

Depending on the service and reporting arrangements agreed with your organisation, reports may be provided to authorised people such as:

- the Executive Sponsor;
- the Client Primary Contact;
- authorised executives;
- People and Culture or Human Resources representatives;
- participating managers;
- authorised administrators;
- the board or governing body; and
- Cultivate personnel or contractors involved in analysis and service delivery.

Different recipients may receive different levels of information.

For example:

- executives may receive organisational and comparative reporting;
- managers may receive aggregated results for their team where the reporting threshold is met;
- administrators may receive participation or completion information;
- Cultivate analysts may access response data for reporting and quality assurance; and
- no recipient should ordinarily receive an individual participant's identified responses.

Access is governed by the relevant Engagement Agreement, reporting framework, platform permissions, privacy commitments and applicable law.

10. How the results may be used

Your organisation may use aggregated results to:

- understand employee experience;
- identify organisational strengths and opportunities;
- establish leadership and engagement priorities;
- support manager development;
- develop Manager Action Plans;
- improve communication, recognition, trust, clarity and other workplace conditions;
- monitor leadership consistency;
- measure improvement;
- evaluate the impact of Cultivate activities; and
- support organisational planning and decision-making.

Cultivate does not intend survey results to be the sole basis for disciplinary action, termination or another serious adverse employment decision affecting an individual.

Survey results reflect employee perceptions and should be interpreted alongside other relevant evidence, sample size, response rates and organisational context.

11. Is participation compulsory?

Participation in the survey is required by your organisation.

Although completion of the survey is compulsory:

- written comments are optional; and

- you should not include your name, another person's name, or unnecessary personal or sensitive information in any written response.

Your organisation may be able to determine whether you have completed the survey, but it should not ordinarily be able to see how you answered. Survey responses will be handled in accordance with the confidentiality, aggregation and reporting protections described in this Notice.

Once an anonymous response has been submitted, Cultivate may be unable to locate, amend or withdraw it because it may not be linked to your identity.

Questions about the requirement to participate should be directed to your organisation.

12. What happens if you do not participate?

If you do not participate:

- Cultivate will not receive your survey responses;
- your individual perspective will not contribute to the results;
- your organisation may receive a less complete picture of employee experience; and
- some team or group results may not meet the required reporting threshold.

Your organisation may know whether you have completed the survey where unique distribution or completion tracking is used, but it should not ordinarily know how you answered.

Cultivate does not determine any workplace consequences associated with non-participation.

13. Overseas processing

Some of Cultivate's technology or service providers may store, access or process information outside Australia.

Likely overseas locations are:

- United States of America
- Belgium
- Germany
- Great Britain
- Canada
- India
- Philippines

Cultivate will take reasonable steps appropriate to the circumstances to manage overseas handling through measures such as contractual privacy obligations, access controls, security requirements and provider assessment.

An APP 5 notice should state whether overseas disclosure is likely and, where practicable, identify the relevant countries.

14. Information security and retention

Cultivate takes reasonable technical, organisational and physical steps to protect survey information against:

- misuse;
- interference;
- loss;
- unauthorised access;
- unauthorised modification; and
- unauthorised disclosure.

Controls may include:

- access restrictions;
- role-based permissions;
- encryption;
- secure hosting;
- logging and monitoring;
- confidentiality obligations;
- service-provider controls;
- reporting thresholds;
- suppression of small groups;
- secure retention and disposal; and
- data-breach response procedures.

Survey information is retained only for as long as reasonably necessary to:

- deliver the contracted services;
- prepare reports;
- conduct trend and longitudinal analysis;
- evaluate progress;
- maintain audit and security records;
- resolve complaints or disputes; and
- comply with legal and contractual obligations.

Where information is no longer required, Cultivate will take reasonable steps to destroy or de-identify it, unless retention is required or permitted by law.

15. Accessing or correcting information

Because the survey does not ordinarily collect your name, Cultivate may be unable to locate a particular response or establish that it belongs to you.

You may request access to, or correction of, personal information that Cultivate can reasonably verify relates to you. However:

- anonymous responses may not be retrievable by participant;
- an opinion cannot ordinarily be corrected merely because another person disagrees with it;
- access may be limited to protect the privacy of other people;
- confidential survey information may be withheld where permitted by law; and
- Cultivate may need to consult your organisation.

Further information is contained in the Cultivate Privacy Policy.

16. Privacy questions or complaints

Privacy enquiries or complaints may be directed to:

Ms Neha Dharma, Privacy Officer

CultivateXP Pty Ltd

Email: info@cultivatexp.com.au

Telephone: 02 8448 3200

Address: Level 15, Station Street East, Parramatta NSW 2150

Further information about how Cultivate manages personal information, access and correction requests, complaints, security, retention and overseas processing is available in the:

Cultivate Privacy Policy: https://cultivatexp.com.au/wp-content/uploads/2026/07/Cultivate-Privacy-Policy-Website-and-public-facing-privacy-information_v.y-2026.pdf

Where a privacy complaint cannot be resolved directly with Cultivate, you may contact the **Office of the Australian Information Commissioner**.

Participant acknowledgement

I acknowledge that:

- I have read this Survey Participant Collection Notice;
- I understand the purpose of the survey and how the results may be used;
- I understand that my name is not ordinarily collected as part of my survey response;

- I understand that absolute anonymity cannot be guaranteed where my answers, segmentation selections or written comments identify me;
- I understand that optional segmentation questions may be left unanswered;
- I understand that minimum reporting thresholds and suppression rules will be applied;
- I understand that written comments may be redacted, summarised, moderated or withheld;
- I will avoid including names or unnecessary identifying or sensitive information in written comments; and
- I have had the opportunity to review the Cultivate Privacy Policy.