



Salisbury College Australia

Privacy Policy - Privacy Act 1988 (Cth)



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1. YOUR PRIVACY IS IMPORTANT TO US

- 1.1 This document comprises the Privacy Policy of Institute of Global Education and Training Pty Ltd ACN 608 969 133 trading as Salisbury College Australia, and outlines the manner in which we collect, use, disclose and manage personal information.
- 1.2 We treat your privacy very seriously and recognise the importance of protecting personal information at all times.
- 1.3 We are committed to ensuring the privacy of the personal information you have provided to us. We are bound by the Australian Privacy Principles (APPs), established under the Privacy Act 1988 ("Act").

2. HOW DO WE COLLECT PERSONAL INFORMATION?

- 2.1 We may collect personal information from you from a variety of sources, including but not limited to when you:
 - 2.1.1 Inquire about Salisbury College Australia and/or its courses;
 - 2.1.2 Apply for enrolment at Salisbury College Australia;
 - 2.1.3 Become a student at Salisbury College Australia;
 - 2.1.4 Subscribe to receive our alerts, newsletters or other publications, completing forms, or participating in surveys, research or promotions;
 - 2.1.5 Contact us for any reason including, but not limited to, reporting a problem with our website, requesting further services or seeking our assistance; and
 - 2.1.6 Apply for employment with us directly, via a social networking site (eg. LinkedIn) or through your nominated referees.
- 2.2 Note that this list is not exhaustive as there may be other situations or circumstances in which we may be required to collect personal information from you. We will endeavour to notify you when we collect your personal information before, during or as soon as practicable. We will not collect any personal information from you except when you have knowingly provided that information to us or you have authorised a third party to provide that information to us.
- 2.3 We may collect personal information during the course of our operational activities, such as recruitment information, student placement information, research grant applications, academic feedback and examination results and library loan records.
- 2.4 We may also collect personal information from third party sources, such as through education agents, online enrolment or recruitment portals and call centre representatives.



- 2.5 Note that we may be required to collect your personal information as a consequence of a legal or regulatory requirement such as under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (“AML/CTF Act”).

3. ANONYMITY AND USE OF PSEUDONYMS

- 3.1 You have the right to remain anonymous or use a pseudonym when dealing with Salisbury College Australia, particularly when making initial enquiries
- 3.2 Please note, however, that it is impracticable for us to deal with people who have not identified themselves, or who have used a pseudonym, for a significant proportion of our business operations (such as in matters relating to enrolment, teaching and assessment of individual students).

4. TYPES OF INFORMATION WE MAY COLLECT

- 4.1 The information collected will generally comprise personal information relating to staff, students and other individuals who have dealings with Salisbury College Australia.
- 4.2 Such information includes name, gender, residence, contact details (including phone, mobile and email address), date of birth, details of next of kin, identifying information, including photographs, records of injuries, criminal checks, student enrolment information and academic performance, qualifications, reason for study, language, financial information, passport number, tax file number, employment status, work history, information concerning individuals who apply for appointment or admission, and information collected from or concerning human research subjects.
- 4.3 Sensitive personal information that you may consent to provide, or which we are authorized to collect by law could include racial or ethnic origin, language and literacy needs, membership of a professional or trade association, criminal record, health information, and visa and immigration information and status.
- 4.4 If you do not provide us with the information asked for we may not be able to provide the service you have requested.

5. USE OF YOUR PERSONAL INFORMATION

- 5.1 We will only collect personal information that is reasonably necessary for, or directly related to, one or more of our functions and activities such as to enable us to provide products and services to you and to carry out our function as a registered training organisation. As a general rule, we do not collect sensitive information but if we do, we will seek your consent beforehand
- 5.2 We will not use information about you other than for a purpose made known to you, a purpose you would reasonably expect, a purpose required, authorised or permitted by law, or a purpose otherwise authorised by you. These purposes include:



- 5.2.1 Enrolling, teaching, evaluating, examining and graduating our students;
 - 5.2.2 Enhancing and assessing staff and/or student experience;
 - 5.2.3 Offering a range of services to its staff and students including library access, career advice, health and counselling services, and recreational activities;
 - 5.2.4 Maintaining contact with its alumni and with other stakeholders in the community;
 - 5.2.5 Community engagement;
 - 5.2.6 Reporting to government agencies;
 - 5.2.7 Commercial application of our intellectual property and professional expertise;
 - 5.2.8 Undertaking staff and student recruitment activities and information sessions;
 - 5.2.9 Undertaking research and related studies;
 - 5.2.10 Handling of complaints and inquiries;
 - 5.2.11 Statistical and marketing analysis and analytics
- 5.3 We will not use or disclose personal information for purposes other than the purpose for which it was collected (“primary purpose”) unless:
- 5.3.1 You have consented to a secondary use or disclosure, or
 - 5.3.2 The secondary use or disclosure is related to the primary purpose (in the case of personal information that is not sensitive information) or is directly related to the primary purpose (in the case of sensitive information), or
 - 5.3.3 It is otherwise required or authorised by or under an Australian law or a court/tribunal order.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

- 6.1 We may disclose your personal information in the following circumstances:
- 6.1.1 Where we have contracted an external organisation to provide us with support services. Such services may include but are not limited to processing applications for enrolment, marketing support, market research, debt collection, insurance, information technology arrangements, records management, regulatory monitoring, auditing, compliance and screening.
 - 6.1.2 To related entities with an intention to better understand your needs and provide you with information about services from across the group that are most relevant to you;
 - 6.1.3 To comply with our legal obligations, such as under the AML/CTF Act; and
 - 6.1.4 Where we suspect that unlawful activity has been or may be engaged in and the personal information is a necessary part of our investigation or reporting of the matter.
- 6.2 We may disclose your personal information only with your consent in the following circumstances:
- 6.2.1 Where organisations cooperate with us in offering products and services;



- 6.2.2 To service providers such as credit reporting agencies in order to conduct credit and/or compliance verification checks; and
- 6.2.3 To anyone else you authorise us to disclose information to, from time to time.
- 6.2.4 Only information pertinent to the supply of our services is provided and strict confidentiality requirements are adhered to. Where personal information is disclosed to an external company operating in a foreign country, we will take all reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your information.

7. QUALITY OF PERSONAL INFORMATION

- 7.1 We collect and verify your information directly from you, or from independent specialist sources, thereby upholding the quality and accuracy of your personal information.
- 7.2 Before we use or disclose your personal information, we will take reasonable steps to ensure that your personal information is accurate, complete, relevant, up-to-date, and is not misleading. If you believe the information that we hold about you is inaccurate, incomplete or out-of-date, contact us and we will endeavour to either correct the information in our systems, or if necessary, discuss alternative action.

8. STORAGE AND SECURITY OF INFORMATION

- 8.1 We are committed to keeping secure the personal information you have provided to us. We will take all reasonable steps to protect your personal information from loss, misuse, unauthorised access, modification or disclosure. For example, your personal information is stored in secure premises and access to these premises is strictly controlled.
- 8.2 Personal information is stored electronically and in hard copy form, including databases.
- 8.3 We understand that our staff and students require peace of mind when it comes to the security of using the Internet. We use modern security measures such as secure firewalls, servers, databases and data encryption to safeguard the personal information provided by you.
- 8.4 We will not keep your information for longer than necessary, and where we no longer need your information, we will take reasonable steps to destroy or de-identify it.

9. ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION

- 9.1 You have the right to access the personal information we hold about you.
- 9.2 If you wish to access your information then we ask you to contact us. We will need to verify your identity prior to meeting your requests. Unless a lawful exception applies, we will endeavour to grant you access to personal information which we hold about you within 30 days.



- 9.3 If you find that the information we hold about you is inaccurate or out-of-date then we will endeavour to correct it within 30 days upon receiving your request in writing.
- 9.4 In the event that we are unable to grant you access to your personal information, or are unable to correct your personal information, we will provide you with a written explanation as well as the complaint mechanism available to you. Exceptions to this include:
- 9.4.1 Where providing access will provide a serious threat to life or health of any individual or pose an unreasonable impact on the privacy of an individual;
 - 9.4.2 Your request for access or correction is frivolous or vexatious;
 - 9.4.3 Where information relates to existing legal proceedings between us and you; or
 - 9.4.4 Where providing access would be unlawful or may prejudice an investigation of possible unlawful activity.

10. CHANGES TO THIS POLICY

- 10.1 We may make changes to this Privacy Policy from time to time and for any reason including, but not limited to, the introduction of new legislation.
- 10.2 Any changes to this Privacy Policy will be updated regularly through brochures and/or our website.

11. LINKS TO EXTERNAL SITES

- 11.1 Our website may contain links to other websites whose operators may or may not adhere to a Privacy Policy or be governed by privacy laws. We are not responsible for the content or practices of websites operated by third parties that are linked to our sites. These links are for the user's convenience only. Links to third party sites do not constitute approval by us of the content, policies or practices of those third-party sites. Once you have left our site via such a link, you should check the applicable Privacy Policy of that site.
- 11.2 We may establish relationships with business partners that allow visitors to our website to link directly to sites operated by these partners. Some of these sites may be "co-branded" with Salisbury College Australia; however, these sites may not be operated or maintained by us or on our behalf. These sites may collect personal information from you that may be shared with us.
- 11.3 This Privacy Policy will apply to any personal information we obtain in this manner.

12. USE OF COOKIES, WEB BEACONS & OTHER SOFTWARE

- 12.1 We use cookies, web beacons and measurement software and tools on our website. Our service providers, business partners and other associated third parties also do the same. We use and disclose the information collected through the use of cookies, web beacons and measurement software and tools in accordance with this Privacy Policy.



- 12.2 Cookie is a small amount of data that is sent to your computer or mobile device browser and is stored on your device's hard drive. Please note unless you have adjusted your browser settings to refuse cookies, our system will automatically issue cookies when you access our website. A notification is displayed on our website to alert you of the use of cookies.
- 12.3 We use cookie information to track usage patterns and provide us with statistics to analyse and improve our website for a better browsing and usage experience. Such information can be the number of users who visit our site, the date and time of visits, the number and type of pages viewed and navigation patterns.
- 12.4 Cookies do not identify individual users, although they do identify a user's browser type, Internet Protocol address, location, screen size, etc. You have the ability to configure your browser to accept or decline all cookies or notify you when a cookie is sent. If you disable or reject some or all cookies you may not be able to view or use parts of our website, and you may not have full access to all of the applications and information on our website.

13. HOW TO OPT OUT OF MARKETING ACTIVITIES

- 13.1 You may be contacted by mail, telephone or email regarding our services, promotions, newsletters, surveys and similar materials that we may conduct or distribute from time to time. If you do not wish to receive any such communications, you may advise us that you wish to opt out:
 - 13.1.1 By utilising the unsubscribe (opt-out) functionality or link provided in the direct marketing communications we send you;
 - 13.1.2 by sending us an email to admin@sc.edu.au; or
 - 13.1.3 by mail addressed to the Privacy Officer, Salisbury College Australia, L4 & L5, 14 Railway Parade, Burwood NSW 2134.

14. LODGING A PRIVACY COMPLAINT

- 14.1 While we will always strive to do our best, we recognize that we are not perfect: there will be times when we may not meet your service expectations. We are, however, fully committed to providing you with a fair and efficient process for the handling of any complaints that you might have.
- 14.2 If you wish to complain about any breach or potential breach of this Privacy Policy or the Australian Privacy Principles, you should contact us and request that your complaint be directed to the Privacy Officer.
- 14.3 We will use our best endeavours to respond and resolve any complaint to your reasonable satisfaction. If you are unhappy with our response, you may apply to the Office of the Australian Information Commissioner (OAIC) to have your complaint investigated.



14.4 For more information on how you may lodge a complaint with the OAIC, please contact the Commissioner's hotline service on 1300 363 992, or visit their website on www.oaic.gov.au.

15. HOW TO CONTACT US

15.1 For more information please see our website www.sc.edu.au.

15.2 If you have any privacy-related enquiries, you may contact us by:

15.2.1 calling us on: 1300 121 888;

15.2.2 sending an email to: admin@sc.edu.au; or

15.2.3 mail addressed to: Privacy Officer, Salisbury College Australia, L4 & L5, 14 Railway Parade, Burwood NSW 2134.

16. VERSION CONTROL

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