



# PRIVACY OF INFORMATION POLICY - EXTERNAL POLICY

## PREAMBLE

In the course of carrying out our activities the College will collect, store, use and disclose personal information. The College is committed to the protection of this personal information and to compliance with Australian privacy law.

## DEFINITIONS AND ACRONYMS

“**College**” means Australian Pacific College, English Unlimited and APC Design School.

“**Policy**” means this Privacy Policy - External Policy.

“**Privacy Act**” means the Privacy Act 1988 (Cth).

## POLICY/PROCEDURE

### 1. PERSONAL INFORMATION

- 1.1 Personal information is information or an opinion about an identified or reasonably identifiable individual, whether or not the information or opinion is true and whether or not the information is recorded in a material form.

### 2. TYPES OF PERSONAL INFORMATION THE COLLEGE COLLECTS AND HOLDS

- 2.1 The College collects and holds personal information for the provision of our products and services and purposes connected to those products and services.
- 2.2 Consistent with the provision of our products and services, the types of personal information the College may collect and hold include:
- (a) *Identity and contact details* – individuals’ name, address, date of birth, telephone numbers, email addresses, passport and visa information, emergency contact information, photographs, financial information and other kinds of identification documents.
  - (b) *Student information* – photographs for staff and student IDs, unique identifiers such as student identification numbers, Tax File Numbers (TFNs) or Australian Business Numbers (ABNs); and
  - (c) *Other information* – text of communications gathered in the course of the College’s interaction with students, including on live-chat, social media and emails, and other information from student interactions with the college online, including cookie information, security tokens, IP address, URLs, search histories and other associated information.

Sensitive information will only be collected with the consent of the individual or where the sensitive information is reasonably necessary to the operation of the College,



where required by law or by the DHA or a permitted general situation exists. Where an individual is incapable of giving consent to the provision of health information, the College will seek the consent of an authorised representative such as a guardian or next of kin.

### **3. HOW THE COLLEGE COLLECTS AND HOLDS PERSONAL INFORMATION**

- 3.1 The College may collect personal information directly in the course of providing its products and services, from its website and/or directly from you.
- 3.2 Personal information is held securely, is subject to various security protections and is held only for as long as the information remains relevant to the purpose for which it was collected.

### **4. PURPOSES FOR WHICH THE COLLEGE HOLDS, USES AND DISCLOSES INFORMATION**

- 4.1 The College will not use or disclose personal information for any secondary purpose, unless that secondary purpose is related to the primary purpose for which the College has collected that information, and you would reasonably expect the disclosure in the circumstances, or unless consent is given for that use or disclosure.
- 4.2 The purposes for which the College holds, uses and discloses information includes teaching and student services, together with ancillary services, which may support students and staff in their study or work at the College. Other purposes include:
  - a) conducting the College's business generally including but not limited to disclosure to third parties for marketing purposes;
  - b) to communicate information about the College's products and services or third party products or services that may be of interest to you;
  - c) for the College's internal administrative, research, planning, marketing and product development;
  - d) to improve and optimise the College's platforms (including its website); and
  - e) to comply with legal obligations.

### **5. ACCESS AND CORRECTION**

- 5.1 The College will take all reasonable steps to ensure any personal data it collects, uses or discloses is up to date and accurate. If you believe personal information the College holds is not up to date or accurate, you may ask for it to be corrected.
- 5.2 The student may ask for the College to provide him/her with details of the personal information it holds about them and copies of that information. The College will respond to any request for details and attempt to provide the data within thirty (30) days of receipt of a written request.



5.3 If the College provides a student with copies of the requested information, it may charge the student a reasonable fee to cover the administrative costs as set out on the Schedule of Administrative (Non-Tuition) Fees of providing that information.

5.4 Please direct all requests for access and correction to Student Care.

## 6. OVERSEAS DISCLOSURE

6.1 The College may, in the course of providing products and services, disclose personal information to overseas entities.

## 7. CHANGES TO THIS POLICY

7.1 The College will review and update this Policy from time to time as needed without notice. You should review the terms of this Policy periodically to make sure that you are aware of how the College collects, holds, stores and uses personal information.

## 8. COMPLAINTS

8.1 If you consider there to be a breach of the Privacy Act, you may direct your query to the Head of the Business & Innovation Unit via Student Care or the Design Registrar and the College will attempt to resolve the complaint.

8.2 If the student does not consider the College's response satisfactory, the student may contact the Australian Privacy Commissioner at its website [www.oaic.gov.au](http://www.oaic.gov.au) or by telephone on 1300 363 992.

## POLICY REVIEW

This Policy will be reviewed as part of the College's three (3) year review process or as legislation requires.

## RELEVANT LEGISLATION

This document references the following legislation, regulations, codes and standards:

Relevant Legislation/codes/standards	
Commonwealth	Privacy Act 1988 (Cth). VET Students Loan Act 2016 (Cth) Standards for Registered Training Organisations (RTOs) 2015 Higher Education Support ACT 2003

## KEYWORDS

Keywords	Privacy, personal information, collect data, hold data, privacy law
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## POLICY OWNER

<b>Policy Owner</b>	Business and Innovation Unit
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## POLICY/PROCEDURE HISTORY

Policy History			
Current version	Current version release date	Author	Description of changes
Privacy Policy - External Policy v1.0R(APC/EU)	June 2019	Sara Gaudry	Original policy
Privacy Policy - External Policy v1.0 (APC/EU/APC Design School)	May 2020	Sara Gaudry and Ron Newman	Addition of VDI trading as APC Design School.
Privacy Policy - External Policy v1.1R(APC/EU/APCDS)	May 2023	Sara Gaudry	General review by Marque Lawyers