

# Student Privacy Policy

## 1. Background

Transformed Pty Ltd ABN 33 120 497 501 provides distance learning and recognition of prior learning training and related services. In providing these services, we collect, use and disclose personal information. Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is either identified or reasonably identifiable.

We are committed to protecting the privacy of your personal information. This Privacy Policy explains how we collect, use, disclose and otherwise handle personal information. It also tells you how you can ask to access and correct the personal information we hold about you or complain about a suspected privacy breach.

We are required to comply with the Australian Privacy Principles (**APPs**) - 13 APPs from Schedule 1 of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*, which amends the *Privacy Act 1988*. The APPs regulate the manner in which personal information is handled.

## 2. What types of information do we collect?

### 2.1 Personal Information

The type of personal information that we collect and hold about you depends on the type of dealings that you have with us. If we need to identify you or verify your identity, we may collect your name, gender, date of birth, driver's licence and/or passport details. If we need to communicate with you, we may collect your email, residential and postal addresses and telephone numbers. If you apply to enrol in a course, qualification or otherwise access our services, we may collect details of your educational qualifications, enrolment details, academic results, banking and payment details, tax file number (TFN) and USI (Unique Student Identifier)

To help us improve our services, we may collect your responses to surveys and details about how, when and why you access our services.

### 2.2 Sensitive information

Sensitive information is personal information such as health information and information about racial or ethnic origin that is generally afforded a higher level of privacy protection.

In order to comply with our obligations under Australian law, we may collect sensitive information on behalf of the Australian Government, including your language background, citizenship status, status as an indigenous Australian, disability status and health information.

We only collect sensitive information where it is reasonably necessary for our business functions and you have consented, or we are required to do so by law.

### **2.3 Information other than personal information ("non-personal information")**

When you visit our website, some of the information that is collected about your visit is not personal information, because it does not reveal your identity. We use this information to help us improve our services and for marketing purposes. We may aggregate this information for our own statistical purposes. Provided that it remains anonymous, we may disclose that aggregated information to third parties or publish it for marketing or research purposes.

## **3. Why do we collect your personal information?**

### **3.1 General**

The main purposes for which we collect, hold, use and disclose personal information are:

- To identify you and verify your identity;
- To communicate with you about our services;
- To provide our services to you, including:
  - Facilitating your enrolment in a short course or qualification;
  - Facilitating your access to distance learning content;
  - Facilitating your communications with others via our website; and
  - Obtaining payment for our services;
    - For purposes required or authorised by or under law (for example, we may be required to collect personal information for the State or Federal Government for the purpose of assessing your eligibility for funding programs;
    - to help us improve our services;
    - for any other purposes that you have consented to.

## **4. Collecting personal information?**

### **4.1 Methods of collection**

We will collect personal information by lawful and fair means as required by the Privacy Act. We will also collect personal information directly from you where this is reasonable and practicable.

We collect personal information in a number of ways, including:

- Directly from you in person, over the phone, through written communications (either on paper or electronic) or by you completing forms or answering questions on our websites;
- From third parties, including our education providers, direct marketing database providers, government agencies, our related companies and your authorised representatives;
- From our own records of your use of our services.

#### **4.2 Collection Notification**

Where we collect personal information directly from you, we will take reasonable steps to notify you of this matter. We will do this at or before the time of collection, or as soon as practicable afterwards.

Collection notifications provide more specific information than this Privacy Policy in relation to particular collections of personal information. The terms of this Privacy Policy are subject to any specific provisions contained in collection notifications and in the terms and conditions of particular offers, products and services. We encourage you to read those provisions carefully.

Where we collect information about you on behalf of the Australian Government, the collection notification may explain how the Australian Government will use and disclose your personal information. You should note that the Australian Government may use and disclose your personal information in ways that are different from how we use and disclose your personal information.

### **5. Direct marketing**

Where we have your express or implied consent, or where we are otherwise permitted by law, we may use your personal information to send you information about the services we offer, as well as other information. We may send this information by mail, email, SMS and telephone.

#### **Opting out**

You can opt out of receiving these communications at any time, in the following ways:

- Contact us (see section 10 below) and tell us;
- Use the unsubscribe facility that we include in our commercial electronic messages (i.e., email or SMS) to opt out of receiving those messages.

## **6. Disclosing your personal information?**

We may disclose your personal information to any of the organisations that we deal with in the ordinary administration of our business for the purposes set out in section 3 above, including:

- The State or Federal Government;
  - Financial institutions;
- Mailing houses, postal, freight and courier service providers;

In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you.

If you post comments or otherwise communicate publicly with other users via our website, any information about yourself that you include in the communication may be stored on the website and accessed by other users. For this reason, we encourage you to use discretion when deciding whether to post any information that can be used to identify you.

## **7. Data quality and security**

### **7.1 General**

We hold personal information in a number of ways, including student management systems, databases, email contact lists, and in paper files held in secure premises. Paper files may also be archived offsite in secure facilities. We take reasonable steps to:

- Make sure that the personal information that we collect and use is accurate, current, up to date and complete;
- Protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure;
- Destroy personal information that is no longer needed

### **7.2 Security**

The steps we take to secure the personal information include:

- Encryption, firewalls and anti-virus software
- login and password protection),
- secure office access, personnel security and
- Workplace policies.

### **Payment security**

We process payments using various online technologies. All transactions processed by us meet industry security standards to ensure payment details are protected.

### **Website security**

While we strive to protect the personal information and privacy of users of our website, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk.

## **8. Accessing and correcting your personal information?**

You can request access to the personal information that we hold about you and request corrections by contacting our General Manager Training.

## **9. Complaints**

If you have a complaint about how we have handled your personal information, please contact our General Manager Training.

### **Complaints process**

All client complaints must be dealt with in a constructive and timely manner.

1. *Talk to us as soon as there is a problem.*

We encourage you to talk to us and explain your concerns in person to see if this can be quickly resolved. The staff will make a note of your concerns and follow up appropriately.

2. *Meet with the General Manager - Training to explain your complaint.*

If the problem continues or is not easy to resolve informally, please ask for a meeting or e-mail the General Manager - Training. You will be given the opportunity to present your case. We will make notes of the meeting, the complaint and the proposed solution that is hopefully agreed at the meeting. We undertake to investigate the matters you have raised and respond within a reasonable time. We will keep a record of your complaint and the outcome in our register and on file. We may ask you to sign this record, acknowledging your involvement in the complaints process.

3. *If you are still not satisfied, you may write a formal complaint to the Managing Director.*

You may request a **Complaints Form** directly from Transformed, or simply email Transformed outlining the circumstances surrounding your complaint.

Your complaint will be heard by an internal panel that will provide you with the opportunity to put your case. The panel's decision including the reasons will be provided in writing within 4 weeks of the panel meeting.

#### **4. Mediation**

If the matter is still unresolved, we will suggest an independent mediation body to examine the matter. Mediation can be provided through organisations like:

- The Conflict Resolution Network
- A Migrant Resource Centre where bi-lingual support is available if preferred by the complainant.
- Department of Fair Trading or the ACT ombudsman

## **10. Further information**

Please contact us if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details for privacy queries are set out below.

### **General Manager Training**

#### **Transformed Pty Ltd**

**Mail:** PO Box 7129, Kaleen ACT 2167

**Email:** enquiries@transformed.com.au

**Telephone:** 1300 738 720

## **11. Policy Changes**

We may amend this Privacy Policy from time to time. The current version will be posted on our website and a copy may be obtained from our Student Administration.