# Privacy Policy | 2024

| | |
|---|---|
| **Policy Manager** | **Principal** |
| **Approval** | **College Executive** |
| **Issue Date** | **June 2024** |
| **Review Date** | **June 2028** |

The purpose of the Privacy Policy is to ensure that all St George College staff, students & other stakeholders are aware of the legalities and responsibilities attached to the Privacy Act 1988 (amended by the Privacy Amendment (Private Sector) Act 2000) and principles and the consequences of not adhering to the requirements.

It is the policy of St George College to assure the privacy of our staff, students and stakeholders at all times.

It is the policy of St George College to gain written authority from staff, students and stakeholders for the sharing or dissemination of information directly related to the provision of its services.

The only exception to the above is a requirement by law to provide evidence or where St George College's duty of care legally requires the provision of that information i.e. compliance under Child Safe Environments (Children's Protection Act 1993 and relevant amendments).

## 1. Protecting Personal Information

1.1 St George College is committed to managing and protecting the personal information (such as name, address, date of birth, personal email address, etc) that all stakeholders share with us.

1.2 Implementation of this policy ensures that all stakeholders will have confidence that all personal information provided to St George College is solely used by the organisation within the guidelines of the Privacy Act 1988 (amended by the Privacy Amendment (Private Sector) Act 2000) and in an ethical and sensitive manner.

## 2. Collection, Use and Disclosure of Personal Information

2.1 Persons using our website may do so aware that the site do not collect information of a personal nature from such visits.

2.2 Information submitted digitally to our organisation (i.e. electronic data, using an electronic form or application or by sending an email) is collected and used for the nominated purpose only.

2.3 St George College may also use personal information to manage our relationship with the individual stakeholder.

2.4 St George College acknowledges that individuals provide personal information to it on a voluntary basis to assist us to administer and provide quality service and outcomes on their behalf.

2.5 St George College will use contact details to assist in the administration of its services.

2.6 St George College will not disclose personal information to an external company or third party without prior written permission from the individual. An instance where this may apply is where a student or potential student is referred for placement with a an Australian Homestay Network host family or Work Experience Employer.

2.7 Personal information will not be sold to anyone and will not be used for promotions independent of St George College.

2.8 If there is no longer any legitimate purpose for retaining personal information, and within Records Management Legislative compliance, it will be securely destroyed.

Examples of personal information St George College may hold are:

- Name
- Address
- Telephone Number
- Fax Numbers
- Date of birth/age
- Place of birth
- Ethnic origin
- Language spoken at home
- Email address
- Photograph
- Apprentice Results
- Educational Qualifications
- Support services
- VET Results
- SACE Results

## 3. Web links

3.1 Persons visiting St George College's web site are able to access various other sites by clicking on links that our organisation embeds within its site. Stakeholders should be aware that other sites may not be subject to the same privacy standards and procedures.

## 4. Changes to our Privacy Statement

4.1 This information relates to St George College's current privacy policy and standards. St George College may vary its privacy standards from time to time. St George College will make public statements of any changes by publishing them on its website, www.sgc.sa.edu.au or via written notification to our stakeholders.

## 5. Feedback

If you have any comments regarding St George College's privacy statement and policy please advise us via email at registrar@sgc.sa.edu.au or mail to PO Box 29, Torrensville Plaza, South Australia 5031.

## 6. Privacy Policy Explanations

St George College is committed to complying with the National Privacy Principles as set out in the Commonwealth of Australia Privacy Act 1988 and any and all following amendments (Privacy Act 1988).

St George College references the 13 Australian Privacy Principles and the information below is the basic function of each of the 13 principles. The full detail of the Principles can be found at

**http://www.oaic.gov.au/privacy/privacy-resources/privacy-fact-sheets/other/privacy-fact-sheet-17-australian-privacy-principles**

**Australian Privacy Principle 1 - open and transparent management of personal information**

1.1 The object of this principle is to ensure that APP entities manage personal information in an open and transparent way.

**Australian Privacy Principle 2 - anonymity and pseudonymity**

2.1 Individuals must have the option of not identifying themselves, or of using a pseudonym, when dealing with an APP entity in relation to a particular matter.

**Australian Privacy Principle 3 - collection of solicited personal information**

3.1 If an APP entity is an agency, the entity must not collect personal information (other than sensitive information) unless the information is reasonably necessary for, or directly related to, one or more of the entity's functions or activities.

**Australian Privacy Principle 4 - dealing with unsolicited personal information**

4.1 If:

a. an APP entity receives personal information; and

b. the entity did not solicit the information;

the entity must, within a reasonable period after receiving the information, determine whether or not the entity could have collected the information under Australian Privacy Principle 3 if the entity had solicited the information.

**Australian Privacy Principle 5 - notification of the collection of personal information**

5.1 At or before the time or, if that is not practicable, as soon as practicable after, an APP entity collects personal information about an individual, the entity must take such steps (if any) as are reasonable in the circumstances:

a. to notify the individual of such matters referred to in subclause 5.2 as are reasonable in the circumstances; or

b. to otherwise ensure that the individual is aware of any such matters.

**Australian Privacy Principle 6 - use or disclosure of personal information**

6.1 If an APP entity holds personal information about an individual that was collected for a particular purpose (the primary purpose), the entity must not use or disclose the information for another purpose (the secondary purpose)

**Australian Privacy Principle 7 - direct marketing**

7.1 If an organisation holds personal information about an individual, the organisation must not use or disclose the information for the purpose of direct marketing.

**Australian Privacy Principle 8 - cross-border disclosure of personal information**

8.1 Before an APP entity discloses personal information about an individual to a person (the overseas recipient):

a. who is not in Australia or an external Territory; and

b. who is not the entity or the individual;

the entity must take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the Australian Privacy Principles (other than Australian Privacy Principle 1) in relation to the information.

**Australian Privacy Principle 9 - adoption, use or disclosure of government related identifiers**

9.1 An organisation must not adopt a government related identifier of an individual as its own identifier of the individual unless:

a. the adoption of the government related identifier is required or authorised by or under an Australian law or a court/tribunal order; or

b. subclause 9.3 applies in relation to the adoption.

**Australian Privacy Principle 10 - quality of personal information**

10.1 An APP entity must take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that the entity collects is accurate, up-to-date and complete.

10.2 An APP entity must take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that the entity uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant.

**Australian Privacy Principle 11 - security of personal information**

11.1 If an APP entity holds personal information, the entity must take such steps as are reasonable in the circumstances to protect the information:

a. from misuse, interference and loss; and
b. from unauthorised access, modification or disclosure.

**Australian Privacy Principle 12 - access to personal information**

12.1 If an APP entity holds personal information about an individual, the entity must, on request by the individual, give the individual access to the information.

**Australian Privacy Principle 13 - correction of personal information**

13.1 If:

a. an APP entity holds personal information about an individual; and
b. either:
   i. the entity is satisfied that, having regard to a purpose for which the information is h_eld, the information is inaccurate, out of date, incomplete, irrelevant or misleading; or
   ii. the individual requests the entity to correct the information;

the entity must take such steps (if any) as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

## 7. Duration

St George College is required by law to retain all records applicable to a person's learning/training for a period of 30 years. These will be archived 12 months after completion of the accredited course or qualification.

If St George College ceases operation as an RTO:

- In the event that a new owner takes over St George College
  - The new owner will have to meet the VQF registration standards including those meeting Privacy and Records Management.
  - St George College will place a notice in the Advertiser (or its equivalent at the time).
  - The new owner will take responsibility for the archiving and access of those records.

Under various other statutes of limitations St George College is required to keep corporate, administrative, financial records for a minimum period of 7 years.

## ADDITIONAL INFORMATION

If you have any queries about the privacy and security practices for St George College, please contact the Principal.

## COMPLAINTS/CONCERNS

If you believe that your personal information has not been dealt with in accordance with an information privacy principle you may make a written complaint to St George College. Your complaint should be addressed to:

The Principal
St George College
PO Box 29
TORRENSVILLE PLAZA SA 5031

Please refer to the St George College **Complaints & Appeals** Policy.

## RESPONSIBILITIES

### Supervisors

It is the responsibility of employee supervisors to ensure that all employees are conversant and understanding of the requirements of the Privacy Policy and Privacy Act 1988.

### Employees

It is the responsibility of staff to ensure that their behaviour aligns fully with the Privacy Policy and Privacy Act 1988 at all times and that any breach of the policy or Act is reported immediately to the Principal.

### Privacy Statement for publishing on the website

St George College will publish the following statement on the **www.sgc.sa.edu.au** website and provide this statement upon request. The statement will be updated in line with changes in the National Privacy Legislation

### 1. Privacy Statement

1.1 St George College respects your privacy and is committed to protecting your personal information. Our privacy policy outlines how we collect and manage, use and protect your personal information. It also sets out your rights in relation to accessing the personal information we collect and hold about you. We are bound by the Australian Privacy Principles (APP's) in the Privacy Act 1988.

1.2 Personal information is defined in the Privacy Act 1988 and means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

1.3 Our Website may contain links to third party websites such as "Facebook". We are not responsible for the privacy policies of any third party websites. We recommend that you review the privacy policy of each website you visit.

### 2. Collection of Personal Information

2.1 St George College only collects personal information for the purposes of conducting our business as an online retailer and trader. The personal information we collect from you will include information you give us when you:

(a) register or subscribe to our Website;
(b) complete a transaction with us; and
(c) contact us.

2.2 The personal information that we collect on individuals may include, but is not limited to:

(a) your name;
(b) your contact details including your email, home address and billing address;
(c) your payment details; and
(d) other personal information that we collect in the course of a transaction or that you provide to us when you contact us.

2.3 We may collect personal information from individuals who are not customers of our business but whose personal information is given to us by those individuals via our Website (including Help Centre) or in the course of a transaction.

2.4 Where reasonably practicable, we attempt to collect information directly from individuals. When we collect information, we will generally explain to the individual why we are collecting it, who we give it to and how we will use or disclose it or, alternatively, those matters will be obvious from the circumstances.

2.5 If we collect information about an individual from someone else, we will take reasonable steps to ensure that the individual is made aware of the matters listed in clause 2.4.

2.6 We will collect personal information from you by lawful and fair means and not in an unreasonably intrusive way.

2.7 When you visit our Website, we, and/or third parties, may place cookies on your browser to enhance and manage our website and improve our business and the services we provide to you. By using the website and agreeing to this policy, you grant us permission to place and store cookies on your browser. Cookies may be used by us to collect the following information:

(a) your computer's operating system;
(b) your computer's browser type and capabilities;
(c) your computer's Internet Protocol (IP) address and geolocation;
(d) web pages visited, including how you were referred to each web page; and
(e) web page usage statistics, including the time spent on each web page.

Cookies can be managed by accessing the individual settings in your browser.

2.8 We will not identify users or their browsing activities, except where required by law.

**3. Using and Disclosing Your Personal Information**

3.1 We will generally use or disclose your personal information only for the primary purpose for which it was collected; or for a related secondary purpose where you would reasonably expect us to use or disclose the personal information for that secondary purpose. We may otherwise use and disclose your personal information if you have given us consent for the use or disclosure or it is required or authorised by law.

3.2 Generally, we use and disclose your personal information for the purpose of providing you with the goods or services that you have requested, or otherwise to enable us to carry out our business as an online retailer of goods and services.

3.3 If those purposes for which we have collected the information involve providing personal information about an individual to any third party, we will take appropriate and reasonable steps to ensure any personal information is protected.

3.4 We will generally only use personal information for cold call marketing if you have given express or implied consent.

3.5 When enrolling with St George College, you consent to St George College using your personal information, such as your email address, for direct contact purposes. This includes sending you emails about your academic progress, compliance with study requirements or offers for further courses and services. You are obligated to have an You may opt out of receiving direct marketing communications at any time. Our electronic marketing activities will comply with the requirements of the Spam Act 2003 (Cth).

3.6 We may share your information with other organisations when we are required to do so. This includes Australian and South Australian Government Departments such as the Department of Immigration and Border Protection.

## 4. Security of Your Personal Information

We take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure and against other misuse. When no longer required, personal information is destroyed in a secure manner or deleted.

Some of the security measures we use include:

- Access logging tools that protect against unauthorised access to your data and our network.
- Secure work environments and workflow systems that prevent unauthorised access and copying of your personal information.
- Secure server and closed network environments.
- Virus scanning tools.
- Management of access privileges, to ensure that only those who really need it can see your personal information.
- Ongoing training and security reviews.

We will maintain every effort to protect your personal information from inappropriate access and use.

## 5. Access to Your Personal Information and Complaints Procedure

5.1 Under the Privacy Act 1988, you have certain rights to access the personal information we collect and hold about you.

5.2 Generally, subject to the exceptions of APP 12, we will allow you access to the personal information we hold about you within a reasonable time after it is requested. When requesting such access please identify the precise type/s of information requested. You may make a request by contacting the Principal on **(08) 8159 8100** or by writing to us at:
**Privacy Inquiries, St George College, PO Box 29, Torrensville Plaza SA 5031.**

5.3 We take reasonable steps to ensure that the personal information that we collect, use and disclose is accurate, up to date and complete. Where an individual requests to correct information, we will take reasonable steps to correct the information, having regard to the purpose for which it is held. You may lodge a request to correct personal information in the manner outlined in clause 5.2 above.