

Overview

AIIU Limited respects the privacy of individuals and is committed to the collection, use, disclosure and management of, and provision of access to, Personal Information in a manner consistent with the standards contained in the Commonwealth Privacy Act 1988 (the Privacy Act) and the Australian Privacy Principles.

Scope and Application

This Policy applies to all areas of AIIU Limited and all AIIU Limited activities. All employees, titleholders, volunteers, consultants, contractors and agents of AIIU Limited must comply with this Policy and the Privacy Management Plan when collecting Personal Information on AIIU Limited's behalf and when using or dealing with Personal Information in AIIU Limited's possession. Failure to comply with this Policy or the Privacy Management Plan may constitute misconduct and may result in disciplinary action being taken by AIIU Limited.

Policy Principles

1. AIIU Limited's approach to collection of Personal Information

- (a) AIIU Limited will not collect Personal Information unless the information is reasonably necessary, or directly related to, one or more of AIIU Limited's functions or activities.
- (b) AIIU Limited will not collect Sensitive Information unless it is:
 - (i) with the individual's consent; or
 - (ii) required or authorised by Australian law or court/tribunal order; or
 - (iii) exempt under the Privacy Act.
- (c) AIIU Limited will collect Personal Information by lawful and fair means and, where possible, directly from the individual. AIIU Limited collects Personal Information in a number of ways including:
 - (i) from correspondence and submitted forms (including via on-line portals);
 - (ii) as part of any enrolment, registration or subscription process;
 - (iii) in the course of undertaking research;
 - (iv) direct contact whilst providing services or administration of AIIU Limited activities;
 - (v) from third parties with which AIIU Limited collaborates;
 - (vi) from AIIU Limited's monitoring of its IT facilities and services;
- (d) Personal Information collected by AIIU Limited may be held in hardcopy format, or electronic format stored on AIIU Limited's computing equipment or on third party servers.
- (e) At or before the time (or, if that is not practicable, as soon as practicable after) AIIU Limited collects Personal Information about an individual, AIIU Limited will take reasonable steps to provide a Privacy Statement to the individual.
- (f) If AIIU Limited receives unsolicited Personal Information, and AIIU Limited has no lawful basis on which to retain the information, AIIU Limited will destroy that information or ensure that it is de-identified.
- (g) AIIU Limited will provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with AIIU Limited, except where:
 - (i) AIIU Limited is required or authorised by Australian law or a court/tribunal order, to deal with individuals who have identified themselves; or
 - (ii) it is impracticable for AIIU Limited to deal with individuals who have not identified themselves or who have used a pseudonym.

2. How AIIU Limited may use and disclose Personal Information

- (a) The purposes for which AIIU Limited collects, uses and discloses Personal Information will vary depending on the nature of the association between the individual and AIIU Limited.
 - (i) Personal Information of students

AIIU Limited may use this information in assessing admission applications; administration of a student's course of study (including enrolment, scholarships, prizes, timetabling, visa

requirements); delivery of teaching, educational resources, email and other services related to the student's enrolment at AIIU Limited; monitoring a student's progress in their course of study; fulfilling external reporting requirements; internal planning and development; management of health, safety and wellbeing; communicating to students about AIIU Limited. Photographs of students taken in the course of a AIIU Limited activity may be published by AIIU Limited for informational, marketing and promotional purposes.

(ii) Personal Information of prospective students

AIIU Limited may use this information to provide prospective students with information about AIIU Limited; assess admission applications; undertake internal planning and development.

(iii) Personal Information of employees, job applicants, contractors, volunteers or titleholders

AIIU Limited may use this information in assessing applications; administration and management of the employee, contractor, volunteer or titleholder; management of health, safety and wellbeing; fulfilling external reporting requirements; internal planning and development; creating a publicly available AIIU Limited staff contact directory.

AIIU Limited personnel names and expertise, and photographs of AIIU Limited personnel taken in the course of a AIIU Limited activity may be published by AIIU Limited for informational, marketing and promotional purposes.

(b) If AIIU Limited collects or discloses Personal Information other than for those purposes stated above, such other purposes will be notified to the individual in a Privacy Statement.

(c) Other than the purposes stated above or in a Privacy Statement, AIIU Limited will only use or disclose Personal Information for purposes which are in reasonable contemplation or are permitted under the Privacy Act.

(d) AIIU Limited may disclose Personal Information to the following types of third parties:

(i) Government departments and agencies to satisfy reporting requirements;

(ii) external service providers, to the extent such Personal Information is required for the service provider to provide services to AIIU Limited (e.g. mailing house services; email services; externally hosted software and databases; surveys); and

(iii) collaborating parties, to the extent such Personal Information is required for the collaborative activity to be undertaken (e.g. collaborative research; jointly delivered courses or programs; vocational placements).

(e) Some third parties to whom AIIU Limited discloses Personal Information may be located outside of Australia.

(f) AIIU Limited will not use Personal Information for the purpose of direct marketing unless AIIU Limited has obtained consent from the individual. AIIU Limited will ensure the direct marketing communication contains a simple means by which the individual may easily opt out of receiving direct marketing communications from AIIU Limited.

3. How AIIU Limited will manage Personal Information

(a) AIIU Limited will take such steps as are reasonable in the circumstances to:

(i) ensure that Personal Information it collects is accurate, up-to-date and complete;

(ii) ensure that Personal Information AIIU Limited uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant;

(iii) protect Personal Information in its possession from misuse, interference, loss, and unauthorised access, modification or disclosure;

(iv) destroy or de-identify Personal Information if the Personal Information is no longer needed or required to be retained under any law, regulation or code applicable to AIIU Limited.

4. How individuals may seek access to or correction of Personal Information

(a) AIIU Limited will, upon request by an individual, give the individual access to Personal Information about them held by AIIU Limited, unless AIIU Limited has a legitimate reason for refusal.

(b) The procedure for employees, titleholders and students to request access is to contact AIIU Limited in writing or by email to:

- AIIU, Privacy Officer, PO Box 6427, Upper Mt Gravatt, QLD 4122 or email enquiries@aiiu.com.au
- (c) AIIU Limited encourages AIIU Limited Personnel, students and other individuals with whom AIIU Limited has regular dealings to notify AIIU Limited of any changes to their Personal Information. If individuals do not disclose changes or update their Personal Information, this may affect AIIU Limited's ability to administer records or provide services for those individuals.
 - (d) AIIU Limited will respond to requests for correction within a reasonable period after the request is made and will not impose any charges for the request.

5. Breaches and Complaints

- (a) AIIU Limited Personnel who become aware of any breach of this Policy must report the matter to the Manager.
- (b) If an individual believes that their Personal Information has not been handled by AIIU Limited in accordance with this Policy, the individual may make a complaint in writing or by email to:
AIIU, Privacy Officer, PO Box 6427, Upper Mt Gravatt, QLD 4122 or email enquiries@aiiu.com.au

Procedures

Responsibility: All AIIU Limited Personnel

The Privacy Management Plan contains procedures and guidelines on how these Policy principles should be applied. All AIIU Limited Personnel must comply with the Privacy Management Plan.

Definitions

Australian Privacy Principles are contained in the Privacy Act.

Personal Information is defined in the Privacy Act 1988 (Cth) as 'information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.' The types of Personal Information that AIIU Limited collects and holds will depend on the circumstance and relationship between the individual and AIIU Limited. Personal Information that is commonly collected by AIIU Limited includes:

- (a) name
- (b) address (residential, postal and email)
- (c) phone number
- (d) date of birth
- (e) gender
- (f) ethnic origin
- (g) passport number
- (h) banking and credit card details
- (i) tax file number
- (j) health information
- (k) emergency contact details
- (l) photographs or video recordings
- (m) criminal history
- (n) academic record
- (o) records of transactions

Privacy Act means the Privacy Act 1988 (Cth).

Privacy Statement means a notification to an individual at or before the time (or, if that is not practicable, as soon as practicable after) AIIU Limited collects Personal Information, that addresses the following points, as are reasonable in the circumstances:

- (a) the full name and contact details of AIIU Limited responsible for the collection of the individual's Personal Information;

- (b) the purposes for which the individual's Personal Information is collected;
- (c) any law that requires the individual's Personal Information to be collected;
- (d) any third parties to which AIIU Limited may disclose the individual's Personal Information and whether any such party is located overseas;
- (e) any consequences for the individual if all or part of the Personal Information is not provided;
- (f) that AIIU Limited's Privacy Policy is available on AIIU Limited's website.

Sensitive Information is defined in the Privacy Act 1988 (Cth) as:

- (a) information or an opinion about an individual's:
 - (i) racial or ethnic origin; or
 - (ii) political opinions; or
 - (iii) membership of a political association; or
 - (iv) religious beliefs or affiliations; or
 - (v) philosophical beliefs; or
 - (vi) membership of a professional or trade association; or
 - (vii) membership of a trade union; or
 - (viii) sexual orientation or practices; or
 - (ix) criminal recordthat is also Personal Information;
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information; or
- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) biometric templates.

AIIU Limited Personnel means employees, titleholders, consultants, contractors and volunteers.