

## Student Privacy Policy

### 1. Policy Statement and Purpose

Study Group Australia Pty Ltd (SGA) is committed to upholding privacy and ensuring the confidentiality and security of information provided. SGA will only collect personal information by fair and lawful means, as necessary for the functions of SGA.

In collecting personal information, SGA will comply with the privacy requirements of the *Higher Education Support Act 2003* and the Australian Privacy Principles (APPs) set out in the *Commonwealth Privacy Act 1988* and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

### 2. Scope

This policy applies to the personal information of students and people making enquiries about services.

### 3. Definitions and Abbreviations

#### Personal Information

The Privacy Act defines personal information as information or an opinion, whether true or not and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

#### Sensitive Information

Information or opinion about an individual's: racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preferences or practices; or criminal record that is also personal information.

#### Australian Privacy Principles (APPs)

A set of 13 principles governing the collection, management, use, disclosure and transfer of personal information by organisations such as the SGA.

### 4. Policy Provisions and Procedures

#### 4.1 Collection and Use of Personal Information

Information is collected on the enrolment application form and during student enrolment in order for SGA to meet its obligations under the *Higher Education Support Act 2003* (Domestic students), *ESOS Act 2000* and the *National Code 2007* (Overseas students). Furthermore, to ensure student compliance with the conditions of their visas and obligations under Australian immigration laws generally.

The authority to collect this information is contained in the:

- *Education Services for Overseas Students Act 2000*
- *Education Services for Overseas Students Regulations 2001*
- *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007*

At the time information is collected, students will be advised if they are required by a specific law to supply the information requested.

#### 4.2 How SGA Collects Personal Information

Students are asked to supply information to SGA when applying for enrolment, at orientation sessions and during periods of study. Generally this information includes name, address, telephone number(s), email

addresses(s), date of birth, gender, country of birth, nationality, citizenship country, passport details, academic and English language attainments, disabilities, health information, including illnesses, allergies and dietary Information. SGA may also collect information regarding payment of fees.

Personal information is collected directly from students, except in special circumstances where information about them may be obtained from third parties, such as parents or homestay providers in the case of students under the age of 18.

Personal information supplied by individuals will be used to provide information about study opportunities, course administration, academic information and to maintain academic records. If an individual chooses not to give SGA certain information then SGA may be unable to enrol the individual in a course or supply them with appropriate information.

We will collect sensitive information from an individual only if the individual concerned consents to the collection.

With regard to each of your visits to our websites, we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet,
- your login information,
- browser type and version,
- time zone setting,
- browser plug-in types and versions,
- operating system, and
- platform.

We may also collect information about your visit, including:

- the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time);
- products you viewed or searched for;
- page response times,
- download errors,
- length of visits to certain pages,
- page interaction information (such as scrolling, clicks, and mouse-overs), and
- methods used to browse away from the page and any phone number used to call our customer service number.

#### 4.3 Disclosure of Personal Information

Information collected about individuals on the enrolment application form and during enrolment can be provided, in certain circumstances, to the Australian Government and designated authorities and, if relevant, SGA's domestic student tuition assurance scheme or the Tuition Protection Service. This information includes personal and contact details, course enrolment details and changes, and the circumstance of any suspected breach of a student visa condition.

SGA will not disclose an individual's personal information to another person or organisation unless:

- i) the individual concerned is reasonably likely to have been aware, or made aware that information of that kind is usually passed to that person or organisation;
- ii) the individual concerned has given written consent to the disclosure;

- iii) SGA believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or of another person;
- iv) the disclosure is required or authorised by or under law; or
- v) the disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue.

In such circumstances, SGA will include in the records containing that information a note of the disclosure.

Any person or organisation to whom personal information is disclosed as described in this procedure must not use or disclose the information for a purpose other than the purpose for which the information was supplied to them.

#### 4.4 Cross-border disclosures

Before SGA discloses personal information to an overseas recipient, it will take reasonable steps to ensure that the overseas recipient does not breach the APPs (other than APP 1) in relation to that information.

#### 4.5 Disclosure of personal information to University Partners

SGA delivers courses and provides services on behalf of certain universities. In each case, all data collected on behalf of a university is provided by SGA to the university. Students will be informed when this is the case.

#### 4.6 Government-related identifiers

Personal information may be collected to assess an individual's entitlement to Commonwealth assistance under the *Higher Education Support Act 2003* and to allocate a Commonwealth Higher Education Student Support Number (CHESSN). SGA will disclose this information to the Department of Education and Training (DET) for these purposes.

The DET will store the information securely and may disclose information to the Australian Taxation Office. Personal information gathered for these purposes will not otherwise be disclosed without the individual's consent unless required or authorised by law.

All students enrolled in an Australian Vocational Education and Training (VET) course must apply for a Unique Student Identifier (USI) from the USI Registrar. If SGA applies for a USI on your behalf, we will provide some items of personal information about you to the USI Registrar.

#### 4.7 Security of Personal Information

SGA will take all reasonable steps to ensure any personal information collected is relevant to the purpose for which it was collected, is accurate, up-to-date, complete and not misleading.

SGA will store securely all records containing personal information. SGA will take all reasonable security measures to protect personal information collected from unauthorised access, misuse or disclosure.

#### 4.8 Right to Access and Correct Records

Individuals have the right to access or obtain a copy of the personal information that SGA holds about them.

If an individual considers their personal information to be incorrect, incomplete, out of date or misleading, they can request that the information be amended.

Where a record is found to be inaccurate, a correction will be made. Where a student requests that a record be amended because it is inaccurate but the record is found to be accurate, the details of the request for amendment will be noted on the record.

#### 4.9 Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. A cookie message will appear on our site before we store any cookie on your device.

#### 4.10 Advertising and Remarketing Cookies

SGA uses 3rd party vendor re-marketing tracking cookies including the Google Adwords tracking cookie. These tell us when a user arrives on our site by clicking on one of our paid adverts. We also use Google Adwords Remarketing to advertise SGA across the internet. Remarketing will display relevant ads tailored to you based your prior use of our website, through cookies placed on your machine.

These cookies do not in any way identify you or give access to your computer or mobile device. These cookies allow us to tailor our marketing to better suit your needs and only display messages relevant to you.

You can opt out of Google's use of cookies via Google's Ads Settings: <http://www.google.com/settings/ads>.

Requests to access or obtain a copy of personal information must be made in writing and should be sent to:

Compliance Manager  
30 Church Lane  
MELBOURNE VIC 3000

Students may be required to verify their identity when requesting access to information. SGA may charge a fee to cover the cost of verifying the request and locating, retrieving, reviewing and copying any material requested. SGA will advise the likely cost in advance.

#### 4.11 Publication

The Privacy Policy will be made available to students and prospective students by publication on SGA's websites. In order to ensure students have given informed consent for their personal information to be disclosed to certain third parties as outlined in this policy, SGA will advise students on enrolment about this policy and where it is located.

#### 4.12 Complaints and Appeals

If a student has a complaint or an appeal regarding privacy and personal information, the SGA Student Complaints and Appeals Policy and Procedure will apply.

### 5. **Roles and Responsibilities**

The Compliance Manger is responsible for responding to requests for personal information.

### 6. **Supporting Documents**

- *Commonwealth Privacy Act 1988*
- *Privacy Amendment (Private Sector) Act 2000*
- *Privacy Amendment (Enhancing Privacy Protection) Act 2012.*
- *Education Services for Overseas Students Act 2000*
- *Education Services for Overseas Students Regulations 2001*

- *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007*
- *Higher Education Support Act 2003*
- *SGA Student Complaints and Appeals Policy and Procedures*

#### Approval and Review

<b>SGA PRIVACY POLICY</b>	
<b>ELT Custodian</b>	IT Services Director
<b>Policy owner</b>	Compliance Manager
<b>Version Number</b>	Version 2.1
<b>Approval Authority</b>	Legal Counsel
<b>Approval Date</b>	3 June 2016
<b>Next Review Date</b>	April 2020