

## Overview

ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd and all ISA (Aust) Pty Ltd activities. All employees, titleholders, volunteers, consultants, contractors and agents of ISA (Aust) Pty Ltd must comply with this Policy and the Privacy Management Plan when collecting Personal Information on ISA (Aust) Pty Ltd's behalf and when using or dealing with Personal Information in ISA (Aust) Pty Ltd'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 ISA (Aust) Pty Ltd.

## Policy Principles

### 1. ISA (Aust) Pty Ltd's approach to collection of Personal Information

- (a) ISA (Aust) Pty Ltd will not collect Personal Information unless the information is reasonably necessary, or directly related to, one or more of ISA (Aust) Pty Ltd's functions or activities.
- (b) ISA (Aust) Pty Ltd 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) ISA (Aust) Pty Ltd will collect Personal Information by lawful and fair means and, where possible, directly from the individual. ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd activities;
  - (v) from third parties with which ISA (Aust) Pty Ltd collaborates;
  - (vi) from ISA (Aust) Pty Ltd's monitoring of its IT facilities and services;
- (d) Personal Information collected by ISA (Aust) Pty Ltd may be held in hardcopy format, or electronic format stored on ISA (Aust) Pty Ltd'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) ISA (Aust) Pty Ltd collects Personal Information about an individual, ISA (Aust) Pty Ltd will take reasonable steps to provide a Privacy Statement to the individual.
- (f) If ISA (Aust) Pty Ltd receives unsolicited Personal Information, and ISA (Aust) Pty Ltd has no lawful basis on which to retain the information, ISA (Aust) Pty Ltd will destroy that information or ensure that it is de-identified.
- (g) ISA (Aust) Pty Ltd will provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with ISA (Aust) Pty Ltd, except where:
  - (i) ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd to deal with individuals who have not identified themselves or who have used a pseudonym.

### 2. How ISA (Aust) Pty Ltd may use and disclose Personal Information

- (a) The purposes for which ISA (Aust) Pty Ltd collects, uses and discloses Personal Information will vary depending on the nature of the association between the individual and ISA (Aust) Pty Ltd.

- (i) Personal Information of students  
ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd; 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 ISA (Aust) Pty Ltd. Photographs of students taken in the course of a ISA (Aust) Pty Ltd activity may be published by ISA (Aust) Pty Ltd for informational, marketing and promotional purposes.
- (ii) Personal Information of prospective students  
ISA (Aust) Pty Ltd may use this information to provide prospective students with information about ISA (Aust) Pty Ltd; assess admission applications; undertake internal planning and development.
- (iii) Personal Information of employees, job applicants, contractors, volunteers or titleholders  
ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd staff contact directory. ISA (Aust) Pty Ltd personnel names and expertise, and photographs of ISA (Aust) Pty Ltd personnel taken in the course of a ISA (Aust) Pty Ltd activity may be published by ISA (Aust) Pty Ltd for informational, marketing and promotional purposes.
- (b) If ISA (Aust) Pty Ltd 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, ISA (Aust) Pty Ltd will only use or disclose Personal Information for purposes which are in reasonable contemplation or are permitted under the Privacy Act.
- (d) ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd (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 ISA (Aust) Pty Ltd discloses Personal Information may be located outside of Australia.
- (f) ISA (Aust) Pty Ltd will not use Personal Information for the purpose of direct marketing unless ISA (Aust) Pty Ltd has obtained consent from the individual. ISA (Aust) Pty Ltd will ensure the direct marketing communication contains a simple means by which the individual may easily opt out of receiving direct marketing communications from ISA (Aust) Pty Ltd.

### 3. How ISA (Aust) Pty Ltd will manage Personal Information

- (a) ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd.

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

- (a) ISA (Aust) Pty Ltd will, upon request by an individual, give the individual access to Personal Information about them held by ISA (Aust) Pty Ltd, unless ISA (Aust) Pty Ltd has a legitimate reason for refusal.
- (b) The procedure for employees, titleholders and students to request access is to contact ISA (Aust) Pty Ltd in writing or by email to: ISA (AUST), Privacy Officer, PO Box 6427, Upper Mt Gravatt, QLD 4122 or email [enquiries@isa-australia.com.au](mailto:enquiries@isa-australia.com.au)
- (c) ISA (Aust) Pty Ltd encourages ISA (Aust) Pty Ltd Personnel, students and other individuals with whom ISA (Aust) Pty Ltd has regular dealings to notify ISA (Aust) Pty Ltd of any changes to their Personal Information. If individuals do not disclose changes or update their Personal Information, this may affect ISA (Aust) Pty Ltd's ability to administer records or provide services for those individuals.
- (d) ISA (Aust) Pty Ltd 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) ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd in accordance with this Policy, the individual may make a complaint in writing or by email to:
- (c) ISA (AUST), Privacy Officer, PO Box 6427, Upper Mt Gravatt, QLD 4122 or email [enquiries@isa-australia.com.au](mailto:enquiries@isa-australia.com.au)

#### Procedures

##### Responsibility: All ISA (Aust) Pty Ltd Personnel

The Privacy Management Plan contains procedures and guidelines on how these Policy principles should be applied. All ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd collects and holds will depend on the circumstance and relationship between the individual and ISA (Aust) Pty Ltd.

Personal Information that is commonly collected by ISA (Aust) Pty Ltd 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) ISA (Aust) Pty Ltd collects Personal Information, that addresses the following points, as are reasonable in the circumstances:

- (a) the full name and contact details of ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd 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 ISA (Aust) Pty Ltd's Privacy Policy is available on ISA (Aust) Pty Ltd'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.

**ISA (Aust) Pty Ltd Personnel** means employees, titleholders, consultants, contractors and volunteers.