

Privacy Policy

1. Introduction

The CPP Student Portal is operated by Higher Ed Services Pty Ltd ABN 31 060 566 029 (HES). HES is an 'APP entity' within the meaning of the *Privacy Act 1988* (Cth) (Privacy Act) and is subject to the Australian Privacy Principles (the APPs) which form part of the Privacy Act. The APPs regulate how organisations collect, use, keep, secure, disclose and dispose of personal information. The Privacy Act and the APPs are available for perusal at <https://www.oaic.gov.au/privacy/privacy-legislation>.

The APPs aim to ensure that organisations holding information about people, handle that information responsibly.

HES takes its obligations to protect privacy very seriously. This Privacy Policy has been prepared to help us to comply with our privacy obligations and to inform you of your privacy rights.

2. Privacy Compliance

We comply in all respects with our privacy obligations. This Privacy Policy is binding on HES as an organisation as well as on our staff.

3. Definition

For the purposes of this Privacy Policy, personal information has the meaning currently given in the Privacy Act, namely:

'any 'information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not'.

Common examples of personal information are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details, employment details and commentary or opinion about a person.

4. Collection, use and control of personal information

HES:

1. Collects and uses personal information only where it is necessary for one or more of its functions and activities - the nature of the activity or the nature of HES's dealings with you will determine the type and extent of personal information collected. Examples of the types of information (including personal information) that HES collects are set out in section 6 below;
2. Will ordinarily collect personal information about the people who use our products or services or who interact with us through our websites.
3. Will collect personal information only by lawful and fair means and not in an unreasonably intrusive way;
4. Will not transfer personal information outside Australia unless the individual consents;
5. When collecting personal information that is regarded under the Privacy Act as 'sensitive', will collect such information only from the person concerned and with their consent or otherwise as permitted under the APPs;
6. Will take reasonable steps to ensure that the personal information we collect, store, use or disclose is accurate, complete and up to date; and
7. Will take reasonable steps to protect personal information from misuse and loss, and unauthorised access, modification and disclosure in accordance with this Privacy Policy and the APPs. Please see section 8 of this Privacy Policy for further details.

5. HES will use personal information provided for the following purposes

Generally, we will tell you why we are collecting your personal information when we collect it and we will also tell you how we plan to use it, or this will otherwise be obvious when we collect the information. We will only use your personal information for the purpose disclosed, or otherwise as set out in the Privacy Policy. We will not use your personal information for any other purpose without first seeking your consent (except where authorised or required by law).

We will only collect or hold your personal information where this is reasonably necessary for HES's business functions or activities. In particular, we require your personal information for the purposes of:

1. Providing you with products and services you have ordered, or contacting you in relation to these orders
2. Answering direct enquiries
3. Billing and account management
4. Informing you of new products or services which may be of interest to you and otherwise maintaining our relationship with you
5. Providing customer service
6. Complying with legal obligations where necessary and to exercise our legal rights
7. Allowing us to run our business and perform administrative and operational tasks, such as training staff; developing and marketing products and services; risk management; systems development and testing, including our websites and other online channels; undertaking planning, research and statistical analysis, (the Primary Purposes).

Unless you tell us otherwise, we may use your personal information to market and advertise our products and services to you (except where you have 'opted out') – see further information at section 9 below.

You do not have to provide us with personal information, however, if you do not, we may not be able to carry out some or all of the Primary Purposes.

By submitting your personal information to us, you consent to us using or disclosing your personal information for the Primary Purposes set out above and any purpose related to the Primary Purposes that could be reasonably anticipated at the time your personal information was collected.

We may also use and disclose your personal information:

1. with your consent;
2. where we are authorised or required to do so by law;
3. to our third party partners or third party service providers who work with us in our business (for example, website hosting and cloud service providers, payment processors, security service providers and support service providers), to provide, promote or improve our products and services;
4. where reasonably necessary to assist a law enforcement agency; and
5. as permitted under the APPs.

6. Collection of personal information

We primarily collect personal information directly from you or as a result of your interactions with us, for example when you purchase goods or services from us or register for one of our events (e.g., conference), or register a user account on our website. We may also collect personal information from you when you have other dealings with us, for example, if you provide us with feedback or seek customer support.

The types of personal information collected and held by HES will vary depending on your dealings with us, and may, by way of example, include any or all of the following:

- name, address(es), telephone number(s) and other contact details;
- associated company name(s), position, occupation and other business details;
- electronic address(es);
- bank account details or other financial information;
- credit card details; and
- transaction details relating to your use of our products, services or benefits.

We may also collect personal information automatically through your use of our websites. This includes information we receive from devices you use when you access our websites or use our services, including from third party providers such as Google Analytics. Please see section 10 for more information.

We may also collect your personal information from third parties if you have consented to this.

7. Requests for access to and correction of your personal information

You have the right to access the personal information that we hold about you. You may request copies of the personal information we hold about you (or a summary of such information) by writing to us or contacting us at cppsupport@hes.edu.au. For your protection, we may require you to confirm your identity before access to your personal information is granted. We will endeavour to respond to any request from you within a reasonable timeframe (but not more than 30 days). If we need more time, we will seek to agree this with you.

If you are aware that the personal information we hold about you is out of date, incomplete or inaccurate, please let us know. We will not refuse to make a correction without giving our reasons. However, if we do lawfully refuse to make a correction, we will take reasonable steps to place with the disputed information a statement from you saying that in your opinion it is out of date, incomplete or inaccurate.

8. Storage and protection of personal information

The security of your personal information is important to HES and HES takes all reasonable steps to keep your personal information secure. We follow generally accepted industry standards to store and protect the personal information submitted to us both during transmission and once we receive it. For example, we use appropriate website protection measures such as firewalls and anti-virus software, security restrictions on access to our computer systems, and controlled access to our corporate premises.

We store your personal information in accordance with applicable law and take reasonable steps to destroy or permanently identify it when we no longer need it. We will retain personal information for the period necessary to fulfil the purposes set out in this Privacy Policy unless a longer retention period is required or permitted by law.

9. 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 promotions, products or services we offer as well as other information. We may send this information by mail, email, SMS, telephone or via notifications on our websites.

In each direct HES marketing communication, we will include:

- a statement appearing on the relevant piece of marketing material notifying you of your right to opt-out from further direct marketing communications; and,
- a simple means for you to opt-out of receiving further direct marketing communications of that kind.

Should you choose to opt-out, we will stop using your personal information for direct marketing purposes.

10. Third-Party Web Tracking e.g. Google Analytics

Our websites use Google Analytics, a web analytics service provided by Google Inc. (Google). Google uses cookies and JavaScript code to enable analysis on usage of our websites. The data collected about your use of our websites, (including your IP address) will be transmitted to and stored on Google's servers. Google will use this data for the purpose of compiling reports on website activity for us and providing other services relating to website activity and internet usage.

Google will not collect personal information about you and the reports provided by Google to us will only contain aggregated non-personal data about your use of our websites. We will use the data collected by Google Analytics to improve the functionality of our websites.

11. Questions

If you have any questions or concerns, please contact us at cppsupport@hes.edu.au.

If we cannot resolve a complaint related to your personal information, you may wish to contact the Office of the Australian Information Commissioner (OAIC) directly. See <http://www.oaic.gov.au/> for further information.

12. Changes

Please note that this Privacy Policy will be subject to regular review and updated as required. We will publish any updated privacy policy on our websites and otherwise take reasonable steps to notify you of any changes. It is your responsibility to review our Privacy Policy regularly and make sure you keep up to date with any changes.