

Policy Name	CAL Corporate Solutions Privacy Policy
Date Written	29 October 2019
Responsible dept.	[Operations]
Current Version	V1

PURPOSE

CAL Corporate Solutions (CCS) complies with all relevant Commonwealth, State and Territory Legislation and regulatory requirements relevant to its operations, including the Australian Privacy Principles set out in the Privacy Act 1988.

The Privacy Act 1988 (Privacy Act) regulates how personal information is handled. 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.

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

The Privacy Act includes thirteen Australian Privacy Principles (APPs), which apply to some private sector organisations, as well as most Australian and Norfolk Island Government agencies. These are collectively referred to as ‘APP entities’. The Privacy Act also regulates the privacy component of the consumer credit reporting system, tax file numbers, and health and medical research.

SCOPE

The scope of this policy includes:

- Collection and use of personal information,
- Information collection via the CCS website,
- Security and integrity of personal information,
- Marketing,
- Rights to access and correct records,
- Complaints, questions or problems and contacting CCS,
- Publication.

This policy is applicable to all CCS employees, CCS students, clients and other endorsed CCS stakeholders.

DEFINITIONS

Australian Privacy Principles (APPs)	13 Privacy principles for private sector organisations, Australian government, ACT government and Norfolk Island agencies covered by the Privacy Act 1988. https://www.oaic.gov.au/resources/agencies-andorganisations/training-resources/privacy-lawreform/AustralianPrivacyPrinciples_summary_v6.pdf
Personal Information	Is 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.

POLICY STATEMENT

In the course of its business, CCS may collect information from students, organisations or persons seeking to undertake training with CCS and other individuals who interact with CCS in the course of its business, either electronically or in hard copy format, including information that personally identifies individual users. CCS may also record various communications with individuals.

In collecting personal information, CCS will comply with the requirements of the Australian Privacy Principles (APPs) set out in the Privacy Act 1988 (Cth) as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Act).

Personally identifiable information can only be collected after being expressly disclosed to CCS such as through a webform, over the phone or in writing. We are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

Your payment information is not held by us, it is collected by our third-party payment processors who specialise in the secure online capture and processing of credit/debit card transactions.

From time to time, CCS may be related to other entities (related entities) and this Privacy Policy applies if your personal information is dealt with by those related entities. We will not sell or rent your information to third parties.

1. Collection and use of personal information

CCS will only collect personal information from individuals by fair and lawful means which is necessary for the functions of CCS. We will only collect sensitive information with the consent of the individual and if that information is reasonably necessary for the functions of CCS. All information collected is stored securely and only accessed in the process of conducting a necessary function, such as a course consultation, training needs analysis or providing appropriate support to students and clients.

The information requested from or otherwise collected about individuals by CCS will only be used:

- a. To provide details of study/training opportunities,
- b. To enable efficient course administration,
- c. To maintain proper academic records,
- d. To report to government agencies as required by law,
- e. To get in contact with you to provide you with a course consultation,
- f. To provide updates about our products and services,
- g. To carry out market data analysis so that we can continue to enhance our services and offering,
- h. To send you newsletters and promotions and to conduct online surveys,
- i. To communicate with you and provide you with information, products, or services you have requested,
- j. To promote and market our products and services to you or provide you with information that we believe may be of interest to you,
- k. To personalise and customise your experiences on our website,
- l. To share your personal information with our related entities (for example, external auditors), and
- m. As otherwise set out in this Privacy Policy.

If an individual chooses not to give CCS certain information, then we may be unable to enrol that person in a course or supply them with appropriate information.

When you enrol with us and become a CCS student or client, all information about you is retained securely in accordance with this Privacy Policy.

Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

You consent to us using your personal information in the above ways.

We may collect and use your personal information for other purposes not listed above. If we do so, we will make it known to you at the time we collect or use your personal information.

We do not otherwise collect, use, or disclose your personal information without your permission, unless the collection, use or disclosure is:

- a. In accordance with this Privacy Policy or any agreement you enter into with us; or
- b. Required or authorised by law, including without limitation the APPs under the Privacy Act.

2. Information collected via our website

2.1.1 Cookies

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognise your browser and capture and remember certain information.

Like many other websites, we use cookies to collect and store information used to ensure services are personalised and relevant (e.g.: to your time zone or device), to improve marketing efforts and so that we can offer better site experiences and tools in the future. Additionally, it helps certain features of our website – such as the chat feature – function correctly.

We use cookies to help us remember, understand, and save your preferences for future visits, keep track of advertisements, and compile aggregate data about site traffic and site interaction. CCS may also collect general and remember information while browsing the website or interacting with tracked marketing materials; this is inferential information that your web browser or internet service provider (ISP) typically makes available, such as your IP address, geographical location, browser type, referral source, length of visit and number of page views.

We also use third-party service providers to assist in demographic or behavioural analysis, aimed to provide a better experience for our web users. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business. This includes services such as remarketing and behavioural analytics services.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

2.2 Remarketing

We also use third-party remarketing tracking cookies, including Facebook, Google AdWords and Bing Ads tracking cookies. This means we may continue to serve ads on the Facebook Audience Network, LinkedIn, and the Google Content Network (GCN) based on prior website visits. This allows us to make unique offers and continue to market our services to those who have shown interest in our service.

As always, we respect your privacy and are not collecting any personally identifiable information using any remarketing system.

2.3 Behavioural and Analytics Services

We use some behavioural and analytics services to collect aggregate data for report creation about the use of our websites and troubleshoot and identify issues with our sites. This may also be used for tracking marketing performance.

The information generated from these services is not personally identifiable.

You can opt out of other third-party vendor's use of cookies by visiting the Network Advertising Initiative opt-out page: <http://www.networkadvertising.org/choices/>

Note: If you disable the use of cookies on your web browser or remove or reject specific cookies from our websites or linked sites, then you may not be able to gain access to all of the content and facilities in those websites.

2.4 Third party content

The websites contain links to other websites. We are not responsible for the privacy policies of third party websites.

Some of the content on our websites includes applications made available by third parties, such as social media buttons or links that allow you to share content or links to our websites through the relevant third-party platforms.

These third-party applications themselves may facilitate collection of information by those third parties through your interaction with the applications and sometimes even if you do not interact directly with them.

We may also engage the use of third-party services on our website, such as managed live chat. These services may collect and process data in accordance with their privacy policies. Personal data can only be obtained by these services if you are willing provide it along with your consent to have it forward on to CCS. We take care when engaging with these services to ensure they do not misuse information.

We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third-party websites to understand their privacy practices and options they may make available to you in relation to their collection of your personal information.

3. Security and integrity of personal information

CCS is committed to ensuring the confidentiality, security, and integrity of the personal information it collects, uses and discloses.

CCS will take all reasonable steps to ensure that any personal information collected is relevant to the purpose for which it was collected, is accurate, up to date and complete.

CCS will store securely all records containing personal information and take all reasonable security measures to protect personal information it holds from misuse, interference, loss, unauthorised access, modification, or disclosure.

Where CCS has no further use for personal information for any purpose disclosed by CCS or is no longer required to maintain that personal information (whichever is later), all reasonable steps will be taken to destroy or deidentify the information.

4. Marketing

You consent to us using your personal information for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related entities and third parties, now and in the future.

You also consent to us sending you such information by means of direct mail, telemarketing, email, SMS and MMS messages.

Except for where you are a current student with CCS, if you do not want to receive marketing information from us, you can opt out from receiving such material at any time, in any of the following ways:

- a. Following the instructions in the relevant marketing communication;
- b. Clicking on the relevant 'Unsubscribe' link in a direct marketing email that you have received from us;
- c. Contacting us using the contact details and specifying whether your request relates to opting out of a particular marketing channel or from all direct marketing communications from us.

In the case of an existing, current student relationship with CCS, students may customise their email marketing preferences by navigating to the Email Preference Centre from the link at the bottom of a student email communication. This allows you to opt out of particular email marketing such as newsletter and webinar invitations. We are required to communicate with you regarding critical updates to your service, important announcements and where we are required by law to maintain contact and provide reasonable support.

5. Right to access and correct records

Individuals have the right to access or obtain a copy of the personal information that CCS holds about them. Requests to access or obtain a copy of personal information must be made in writing. There is no charge for an individual to access personal information that CCS holds about them; however, CCS may charge a fee to make a copy. Individuals will be advised of how they may access or obtain a copy of their personal information and any applicable fees within 10 days of receiving their written request. Where it is reasonable to do so, access to the information will be provided in the manner requested by the individual.

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 as soon as is practical.

Where an individual 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. There is no charge for making a request to correct personal information.

Written requests for access to, to obtain a copy of, or correct personal information held by CCS should be sent to:

Client Liaison Manager, CAL Corporate Solutions

Level 1, Building 3, 630 Mitcham Road. Mitcham, VIC, 3132

6. Complaints, questions, or problems and contacting CCS

If you:

- a. Have a query or concern about this Privacy Policy or our personal information handling processes, or
- b. Would like to opt out of direct marketing, please contact us at:

CAL Corporate Solutions

Level 1, Building 3, 630 Mitcham Road. Mitcham, VIC, 3132

If you wish to make a complaint:

- a. Students or prospective students may lodge a complaint using CCS's Complaints Procedure which will enable you to lodge complaints of a non-academic nature, including complaints about handling of personal information,
- b. Staff may lodge a complaint in accordance with our Human Resources Policies, and
- c. For any other persons, complaints can be sent in writing to:

The Training Director,

CAL Corporate Solutions

Level 1, Building 3, 630 Mitcham Road

Where not covered by a policy referred to above, we will investigate your queries and complaints within a reasonable period of time of receiving the complaint and will notify you of the outcome of our investigation.

Please see the CCS Complaints and Appeals Policy for more information.

7. Publication

This Privacy Policy and Personal Information Procedures will be made available to students and persons seeking to enrol with CCS and other individuals who interact with CCS by publication on CCS's website: www.calcorporatesolutions.com.au

Alternatively, a copy of this Privacy Policy may be requested by contacting CCS using the contact details provided above.

In order to ensure that students have given their informed consent for their personal information to be disclosed to certain third parties as outlined in this procedure, CCS will advise students on enrolment about these procedures and where they are located.

8. Quality and Continuous Improvement

This Policy and Procedure is subject to systematic review, evaluation, and improvement, including annual review and ongoing feedback from stakeholders.