

Policy Name	CAL Privacy Policy
Date Written	29 October 2019
Responsible dept.	Learning & Development
Current Version	V5

PURPOSE

The College for Adult Learning (CAL) 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 CAL website,
- Disclosure of personal information,
- Security and integrity of personal information,
- Marketing,
- Rights to access and correct records,
- Complaints, questions or problems and contacting CAL,
- Publication.

This policy is applicable to all CAL employees, CAL students and other endorsed CAL 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, CAL may collect information from students or persons seeking to enrol with CAL and other individuals who interact with CAL in the course of its business, either electronically or in hard copy format, including information that personally identifies individual users. CAL may also record various communications between individuals and the College.

In collecting personal information, CAL 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 CAL 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, CAL 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

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

CAL collects your contact information when you download a course brochure from our website. We collect your name, email address and phone number so that a Professional Learning Consultant can get in touch with you.

During an enrolment consultation, a Professional Learning Consultant may collect additional information about you, such as work and education background and goals for the future, so that we can suggest possible courses for you in line with your future aspirations. All of this information must be expressly given or publicly available.

Personal information collected by CAL during enquiry and enrolment processes may include (but is not limited to) the following:

- a. Name,
- b. Gender,
- c. Email address,
- d. Physical address,
- e. Contact details including telephone numbers (landline and mobile),
- f. Education history,
- g. Employment history,
- h. Mental and/or physical disability,
- i. Course and unit enrolment details,
- j. Assessment evidence,
- k. Information from your resume or job application if you apply for a job with us.

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

- a. To provide details of study 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,

- I. 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 CAL 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 CAL Student, 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. CAL 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.

2.4 More information about third-party Cookies used by CAL

Service	Purpose	More Information
Pardot	We use Pardot's suite to gather information about visitors to our website. Personal information is stored in Pardot/Salesforce if our visitors complete a form for example for registration to events, contact/request forms or for subscription to our email communications. Non-personal information such as IP address, operating system, web browser, and pages visited is gathered by Pardot.	https://www.salesforce.com/company/privacy/ Pardot will provide a cookie opt-in banner if you are in a location where this is legally required.
Unbounce	We use Unbounce to monitor landing page performance, and to collect Personal Information provided through a webform regarding course enquiries.	https://unbounce.com/privacy/
Google Analytics	We use Google Analytics to help analyse how you use our website. Google Analytics generates statistical and other information about website use and the demographics of our users. The information generated from these services is not personally identifiable.	https://support.google.com/analytics/answer/6004245 If you do not want your website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics optout page at https://tools.google.com/dlpage/gaoptout

<p>Google Adwords</p>	<p>We use Google AdWords to serve search and display network ads for advertising and remarketing purposes. AdWords will collect certain information generally made available by your ISP to help with marketing performance tracking. The information generated from these services is not personally identifiable.</p>	<p>https://policies.google.com/technologies/ads You may opt out of Google’s use of cookies by visiting the Ads Preferences Manager. https://www.google.com/settings/u/0/ads?hl=en&sig=ACi0TChkj2QJ-FGhqVW_zQwaLU6TMeUbf2F25h136Cu9utpBlxg2fAAyJdhsdSJALWGsu20QFE9dLpi3hd43Y4jMXAYqufK65Zy08XhYiosKocxVmwhYddFNrJNF6dZ8SEAUjHfy4gQJpSxoAZUHe48nhMI5vhlAsziWxrngT yEsyGIOxxKE2w</p>
<p>Bing ads</p>	<p>We use Bing Ads to serve search ads for advertising and remarketing purposes. Bing Ads will collect certain information generally made available by your ISP to help with marketing performance tracking. The information generated from these services is not personally identifiable.</p>	<p>https://advertise.bingads.microsoft.com/en-au/resources/policies/microsoft-bing-ads-privacy-policy</p>
<p>Facebook</p>	<p>We use Facebook to serve ads for advertising and remarketing purposes. Facebook will collect certain information generally made available by your ISP to help with marketing performance tracking. The information generated from these services is not personally identifiable.</p>	<p>https://www.facebook.com/policy/cookies/ You may adjust your Facebook Advertising settings and their use of cookies in the Ad Settings here: https://www.facebook.com/ads/preferences/</p>
<p>Olark</p>	<p>We use our Live Chat service, Olark, to provide support services to our students and to enquiries. Olark collects personally identifiable information provided in a pre-chat form and stores chat transcripts.</p>	<p>https://www.olark.com/help/cookies</p>
<p>Hotjar</p>	<p>We use Hotjar to monitor user experience on the websites, find issues and ask for feedback. The information generated from these services is not personally identifiable.</p>	<p>https://www.hotjar.com/legal/policies/cookie-information</p>
<p>Helphero</p>	<p>We use HelpHero for our students to manage their onboarding site tours. The information generated from Helphero is used to determine whether or not to serve the tour based on site usage. This information is not personally identifiable.</p>	<p>https://helphero.co/privacy/</p>
<p>VidYard</p>	<p>We use vidyard to help track video views and engagement. They will collect information generally provided by your ISP, and where you are an existing contact in our databases, they may process email addresses or other non-PII identifiers to securely link to our systems to identify viewers.</p>	<p>https://www.vidyard.com/privacy/</p>
<p>Chat Metrics/LeadChat</p>	<p>We use LeadChat and Chat Metrics to provide managed chat services. They will collect information generally provided by your ISP as well as site usage data to determine targeting. They may collect and process voluntarily-given personally identifiable data in accordance with their policy but this will not be help in cookies.</p>	<p>https://chatmetrics.com/privacy-policy/ https://www.leadchat.com/privacy/</p>

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.

2.5 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 willing provide it along with your consent to have it forward on to CAL. 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. Disclosure of personal information

Personal information about students studying with CAL may be shared with the Australian Government and designated authorities, including the Australian Skills Quality Authority (ASQA) and The National Centre for Vocational Education Research (NCVER).

This information includes personal and contact details, course and unit enrolment details and changes.

CAL may disclose, or provide access to, your personal information to third parties in connection with the purposes described in section 2 "Collection and use of personal information". Depending on the nature of your engagement with us, we may disclose your personal information to our related entities, to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).

We may also disclose your personal information to our website host or software application providers in certain limited circumstances, for example when our website experiences a technical problem or to ensure that they operate in an effective and secure manner.

CAL will not otherwise disclose an individual's personal information to another person or organisation unless in accordance with this Privacy Policy.

Any person or organisation that collects information on behalf of CAL or to whom personal information is disclosed as described in this procedure will be required to not use or disclose the information for a purpose other than the purpose for which the information was collected by them or supplied to them.

4. Security and integrity of personal information

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

CAL 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.

CAL 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 CAL has no further use for personal information for any purpose disclosed by CAL 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.

5. 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 CAL, 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 CAL, 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.

6. Right to access and correct records

Individuals have the right to access or obtain a copy of the personal information that CAL 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 CAL holds about them; however, CAL 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 CAL should be sent to:

Student Liaison, The College for Adult Learning

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

7. Complaints, questions or problems and contacting CAL

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:

The College for Adult Learning

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 CAL'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 College Principal,

The College for Adult Learning

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 CAL Complaints and Appeals Policy for more information.

8. Publication

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

<https://collegeforadultlearning.edu.au>

Alternatively, a copy of this Privacy Policy may be requested by contacting CAL 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, CAL will advise students on enrolment about these procedures and where they are located.

9. Quality and Continuous Improvement

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

Policy Administration			
Version	Date Approved	Approved by	Next Review Due
1	10/01/2010	Helen Sabell	January 2012
2	20/05/2015	Helen Sabell	May 2016
3	14/06/2018	Helen Sabell	June 2019
4	14/08/2019	Sarah Sabell	August 2020
5	29/10/2019	Sarah Sabell	October 2020
Compliance References			
Statutory	The <i>Standards for Registered Training Organisations (RTOs) 2015</i> Clauses: 8.1, 8.2, 8.5, 8.6		
Industry	Vocational Education and Training (VET)		
Document Located	E:\Public Documents\03_CAL Operations\CAL Policies\02_CAL POLICIES STUDENTS		