

Privacy Policy

Version number	1
Approved by	Corporate Governance Board
Date of approval	8/2/2019

Purpose

The privacy of student and staff information is of the utmost importance to Sydney Institute of Higher Education (SI). Effective privacy and information procedures are crucial to the safety and security of staff and students of SI and the overall success of its operations.

The *Privacy Policy* outlines the processes through which SI monitors and manages privacy pursuant to Federal and State legislation. It establishes the means through which staff and student information will be collected, stored and protected.

Scope

This policy applies to:

- All SI staff and students
- Contractors and subcontractors
- Work experience students and working volunteers
- Visitors and external experts who take part in SI operations

It also applies to students who are undertaking work-integrated learning, as both the student and workplace involved are expected to adhere to privacy standards.

Principles

SI acknowledges its moral and legal responsibility to promote and protect information privacy and welfare of all students and staff members and other workers at SI. Upholding this responsibility is vital to the successful operation of SI's higher education operation, including data integrity, storage and privacy of students as well as staff members. This policy contains information about how SI deals with personal information and the rights of the individual if SI breaches their privacy.

As per the *Compliance Framework Policy*, SI will ensure that this policy aligns with all relevant and applicable legislation and regulations. Sydney Institute of Higher Education is subject to the *Privacy and Personal Information Protection Act 1998* and the *Health Records and Information Privacy Act 2002*.

This policy sets out the privacy responsibilities of staff and students. This policy informs you of policies regarding the collection, use, and disclosure of personal data when you use our website or other systems

and the choices you have associated with that data.

Procedures

Service includes the SI website and the SI mobile application as well as Learning Management System and other administrative systems (the "Service").

Types of Data Collected

Personal Data

While studying at SI, we will ask you to provide personal information for admission and learning purposes and students may provide health related information as part of seeking disability support or special consideration.

Other Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Student identification number
- First name and last name
- Email address
- Address, State, Province, Post code, City
- Cookies and Usage Data
- Usage Data
- Other personal information or data

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies

are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

Use of Data

Personal Data

SI collects and holds personal information about you and your application, enrolment, candidature, academic progression, graduation and the provision of services to you. SI will collect your personal information during the enrolment process and throughout your time as a student with SI. After your enrolment, when you are using SI websites, or requesting or applying for a SI service, you may be asked to provide information about yourself such as your student ID, name, contact details or other personal information.

SI will mainly collect information directly from you. There may be circumstances where information may be provided on your behalf, such as from the Universities Admissions Centre ('UAC') or, if you have applied for a sponsorship or admission through an agent. SI will only collect information from other sources with your consent or in accordance with the law.

Personal information about you, in hardcopy or digital format, is stored in systems owned and managed by SI or in systems under license or by agreement. These service providers are bound by SI's privacy and security requirements. SI retains your personal information in accordance with the *State Records Act 1998* (NSW).

Other Data

Sydney Institute of Higher Education uses the collected data for various purposes:

- for the purpose for which it was collected (such as to meet the object and functions of Sydney Institute of Higher Education)
- for a directly related purpose
- when we have the appropriate consent to do so; or
- as otherwise required, permitted or authorised by law.

In addition, information is collected

- To provide and maintain the Service
- To notify you about changes to our Service

- To allow you to participate in interactive features of our Service when you choose to do so
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

Disclosure of Data

Personal Data

SI will only use or disclose your personal information:

- for the purpose for which it was collected
- for a directly related purpose
- when we have the appropriate consent to do so, or
- as otherwise required, permitted or authorised by law.

SI will use and/or disclose your personal information in administering and managing your application, enrolment, candidature, academic progress and graduation. SI will also use and/or disclose your personal information to administer and manage the provision of services to you, to support your learning and for other directly related purposes that you would reasonably expect, such as to facilitate student support, strategic planning, infrastructure and providing sustainable resources.

SI will only disclose information in accordance with consent received or pursuant to external legislative requirements. For instance:

- In compliance with the law SI will disclose your personal information to Centrelink, the Department of Education and Training, the Department of Home Affairs, the Department of Foreign Affairs and Trade and the Australian Taxation Office.
- If you hold a concession Opal card, we will disclose your name, student ID, date of birth, course expiry date (if applicable) and your assessed eligibility for concession to travel to Transport for NSW for the purpose of determining eligibility for and administering concessions and for directly related purposes such as audit, management and operational activities for concessions.
- To attempt to contact or locate you or to notify the relevant authority or your emergency contact if there are reasonable grounds to be concerned about your welfare or safety.
- For learning and business analytics to assist SI to make better decisions regarding operations and services, your learning experience and outcomes and the promotion of academic excellence. Analytics may also be used to offer you personalised services and support.

Other Data

Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Australia and choose to provide information to us, please note that we transfer the data, including Personal Data, to Australia and process it there.

Your consent to this *Privacy Policy* followed by your submission of such information represents your agreement to that transfer.

Sydney Institute of Higher Education will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this *Privacy Policy* and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Sydney Institute of Higher Education may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Sydney Institute of Higher Education
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security of Data

Personal Data

SI holds information in both computer and paper-based records. SI takes all reasonable steps to ensure the information it holds is accurate and complete and that it is protected from misuse, loss, unauthorized access or disclosure.

Other Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the *Privacy Policy* of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Access to and correction of personal information

Under NSW privacy laws, you have the right to request access to and correct any personal information concerning you held by the University.

Accessing your personal information

You have the right to access any of your personal information held by the University. If you believe that information is inaccurate, not relevant to the purpose for which it was collected, not up to date or incomplete or misleading you have the right to apply to have it amended.

Accessing your student file

Your student file contains information relating to general student administration matters including applications for credit or cross-institutional study, deferral requests and approval, exclusion and re-admission and re-enrolment.

Students may also access other personal information held in records such as Special Consideration forms, Student Appeals proceedings or disciplinary proceedings.

Correction of information

If you consider that SI's records about you are incomplete, incorrect out of date or misleading you can apply to have those records amended. Routine matters, such as change of name, address or other contact information should be directed to the Student Administration Coordinator.

Other Data

Students have the right to request the erasure, portability or restriction of processing of their personal information, and, to object to the processing of personal information.

If a student resides in or are located in, the European Economic Area, under the GDPR, where your information is collected, used or disclosed as a result of your express consent, you may withdraw that consent at any time.

Changes to this Privacy Policy

We may update our *Privacy Policy* from time to time. We will notify you of any changes by posting the new *Privacy Policy* on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this *Privacy Policy*.

You are advised to review this *Privacy Policy* periodically for any changes. Changes to this *Privacy Policy* are effective when they are posted on this page.

Policy Implementation and Monitoring

The *Corporate Governance Board* delegates responsibility for the day-to-day implementation of this policy to the *Audit and Risk Committee* and the Provost.

The *Corporate Governance Board* will review all periodic reports from relevant committees and staff members, in accordance with the *Compliance Calendar*.

Additionally, the *Corporate Governance Board* will review all relevant student complaints, concerns raised by staff members, and instances of student or staff misconduct in accordance with the *Compliance Calendar*.

The *Corporate Governance Board* must ensure that findings from these monitoring activities are taken into account in planning, quality assurance and improvement processes.

Definitions

Corporate Governance Board: the governing body responsible for oversight of all higher education operations, including the ongoing viability of the institution and the quality of its higher education delivery. The *Corporate Governance Board* guides Management and delegates responsibility for academic matters to the *Academic Board*.

Review schedule

This policy will be reviewed by the *Corporate Governance Board* every three years.

Version History				
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1	Corporate Governance Board	8/2/2019		8/2/2022

End of document: "Privacy Policy"

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Related Documents

		Anti-Discrimination Policy
		Compliance Framework Policy
		Critical Incident Response Policy

		<u>Risk Management Policy</u>
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