



## PRIVACY POLICY AND PROCEDURE

### RESPONSIBLE for:

<b>Ensuring Compliance:</b>	Chief Executive Officer
<b>Directly Responsible:</b>	Senior Management
<b>Adhering to Policy:</b>	All Company Personnel

### GOVERNING STANDARDS

The Directors of Heidelberg Corporate Group (HCG) and its associated companies require compliance against the standards of ISO9001, and any Legislation and Regulations that relate to Privacy. Information is available from the related Acts below,

Commonwealth legislation (information may not be limited only to this legislation)

- Privacy Act 1988

### PURPOSE

ETEA is committed to respecting the privacy of all personal information as well as complying with the relevant state and federal principles on privacy, including the 13 Australian Privacy Principles. This policy explains how we manage personal information in relation to these principles.

### SCOPE

This policy applies to all collection, use, disclosure, storage and destruction of Personal or Health Information by ETEA.

### Types of personal Information collected and held:

ETEA collects and holds information from staff and students at the time of employment or enrolment which may include:

- Date of Birth and Gender
- Contact information such as place of residence, postal address, phone number and email address
- Emergency Contacts
- Prior education

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- Employment History or Status
- Country of Birth and Language Spoken
- Disabilities/health concerns

**How information is collected and held:**

This information collected will be obtained only by lawful means via:

- Student enrolment forms;
- Employee contract;
- Interviews, assessments, and training sessions;
- Resumes, references, and additional information provide the company;
- Former employers, educational institutions, and professional and/or regulatory bodies;
- Workplace complaints received about students involved in on-the job training;
- Workplace accidents in which students in on-the job training are involved;

Student information is stored on the Student Management System and the enrolment form can be found on the file server as a scanned PDF document. Staff records are kept on file in the head office.

**The purpose for collecting and holding and disclosing personal information:**

In connection with providing our services we need to collect and disclose personal and sensitive information. The reason is to enable us to:

- Identify and manage our relationships with students;
- Maintain quality course and assessment development;
- Ensure quality business planning;
- Market our services appropriately;
- Distribute information about various opportunities to our students;
- To meet ETEA's obligations to state and federal government bodies;
- To ensure relevant contact can be made in an emergency.

In some instances if the information provided is not complete, we may not be able to assist with the application.

We destroy unused personal identifiable information via a secure manner.

**How an individual may access and correct personal information:**

Where legally possible, personal information held by ETEA about an individual may be accessed by that person upon request to the student administration manager. We endeavour to ensure all of our information about an individual is accurate and current, but if inaccuracies are identified by the individual we will take appropriate steps to correct the information. An access fee may be charged to cover our costs of providing this information to you. All requested information will be provided within 30 days from receipt of the request.

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**How an individual may complain about a breach of the Australian Privacy Principles:**

If a person feels that there has been a breach of privacy principles, they may request a hearing with the General Manager to discuss their situation and resolve the issue in an appropriate manner.

**Disclosure of personal information, including to overseas recipients:**

We will only use personal information for:

- The main purpose of our business;
- Development of our products and services;
- Other purposes where you would reasonably expect us to use this information;
- Where written consent is given by you to it being used for another purpose; and
- When required to do so by law;

In order to fulfil the above we may release your personal information to third parties whom we have a business relationship with, such as:

- Contractors;
- Suppliers;
- Potential employers;
- Actual employers;
- Where we have a legal obligation to provide such information to specific groups.

In the event of your illness or injury, we may use or disclose your health information to any medical or first aid provider for the purposes of administering assistance to you. We may also disclose such information for any other purpose if it relates to the safe conduct of the workplace.

We will not disclose personal information to a person outside of Australia unless that person or body is legally obliged to protect the individual's privacy under equivalent or higher privacy legislation than ourselves.

**AVAILABILITY OF PRIVACY POLICY**

ETEA provides its privacy policy to all students and interested parties free of charge.

**ANONYMITY**

ETEA will only allow staff or students the option of not identifying themselves when entering transactions with us wherever it is lawful and practicable.

**COLLECTION OF SENSITIVE INFORMATION**

ETEA will only collect sensitive information from a student with their signed consent. This is either through a student enrolment form or employment contract.

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**MARKETING COMMUNICATIONS**

ETEA will not forward contact details on to a 3<sup>rd</sup> party for direct marketing purposes, however we may use a person's contact details to inform them of upcoming events of interest. If any person wishes not to receive these communications they will have the option to opt out of further contact.

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