



## PRIVACY POLICY

### Purpose

Australian Institute of Business (AIB) is subject to the *Commonwealth Privacy Act (1988)*, including the Australian Privacy Principles and is committed to protecting personal privacy. This policy describes how AIB deals with personal information that it collects.

This policy is intended to provide a general overview of AIB's policies and procedures for the handling of personal information. Other policies may apply instead of or in addition to this Privacy Policy in certain circumstances. For example, when AIB collects personal information from an individual, AIB may provide them with a privacy collection statement that advises an individual how AIB will handle that information.

By using AIB's [website](#) and/or providing personal information to AIB, an individual consents to AIB handling personal information in accordance with this Privacy Policy.

### Scope

This policy applies to AIB Staff, AIB Representatives, students and alumni.

### Definitions

Unless otherwise defined in this document, all capitalised terms are defined in the [glossary](#).

### Personal Information

Personal information includes any information or opinion about an identified individual, or an individual who is reasonably identifiable.

### Sensitive Information

Sensitive information includes information or opinion about an individual's:

- racial or ethnic group;
- political opinions;
- membership of a political association;
- religious beliefs or affiliations;
- philosophical beliefs;
- membership of a professional or trade association;
- membership of a trade union;
- sexual orientation or practices;
- criminal record;
- child related employment screening reports
- disability status.

Sensitive information also includes information relating to health, genetics or biometrics.

Further information is available on the website of the Office of the Australian Information Commissioner.

## Policy

### 1. Collection of Personal Information

- 1.1 AIB collects information that is reasonably necessary for AIB's functions or activities as set out at section 2 below.
- 1.2 AIB may collect personal information about an individual in the course of their dealings with AIB, including without limitation from the examples of the sources in Section 1.8 below. The type of personal Information AIB collects will depend on an individual's dealings with AIB. Generally, AIB collects personal information such as an individual's:
  - (a) name, date of birth and gender;
  - (b) residential and postal address;
  - (c) phone number;
  - (d) email address;
  - (e) next of kin;
  - (f) emergency contact details;
  - (g) information on student's parents' education and study;
  - (h) bank account details;
  - (i) credit card information (note that AIB does not store credit card information on file and any printed record will be securely destroyed);
  - (j) Tax File Number (note that AIB collects, stores and uses TFN in accordance with the *Privacy Act*);
  - (k) Commonwealth Higher Education Student Support Number (CHESSN)
  - (l) financial information;
  - (m) photographs;
  - (n) video recordings;
  - (o) occupation;
  - (p) education history and previous work experience; and
  - (q) other such personal information as is required in the course of an individual's dealings with AIB, for example for employment purposes, to complete and maintain enrolment in AIB and providing a business and management education service.
- 1.3 AIB may need to collect sensitive information as part of its primary functions and activities or when it is reasonably necessary to do so.
- 1.4 The sensitive information that AIB may collect includes, but is not limited to, information about an individual's:
  - (a) citizenship and visa status,
  - (b) language and ethnic origin,
  - (c) Indigenous Australian status
  - (d) disability status,
  - (e) medical information,
  - (f) criminal record.
- 1.5 Sensitive information will only be collected by AIB with an individual's consent, unless required to do so by law.

- 1.6 The AIB web server automatically collects various types of information when individuals visit the AIB website, such as their computer's operating system, Internet Protocol address, access times, browser type and language and the website that referred an individual to the AIB site. Also, AIB may collect information from an individual's use of cookies. Unless otherwise approved, AIB will only use this information for statistical purposes or to improve the effectiveness and usefulness of its website.
- 1.7 All correspondence between an individual and AIB may also be collected and stored, particularly in regard to sales, support and accounts, including email.
- 1.8 Personal information may be collected by AIB from a range of sources including:
- (a) via telephone or email to AIB;
  - (b) application forms submitted to AIB;
  - (c) contracts entered into with AIB;
  - (d) through the AIB website;
  - (e) through questionnaires and surveys; and
  - (f) occasionally, through AIB's third party affiliates as set out at section 1.9 below.
- 1.9 AIB generally collects personal information directly from an individual unless it is unreasonable or impractical to do so. In some circumstances, AIB may obtain personal information from a third party such as a previous tertiary institution, contractors who supply services to AIB (including marketing companies to whom an individual provided or that have collected an individual's personal information).
- 1.10 If an individual or entity provides AIB with personal information about a third party, that individual or entity represents, and AIB collects it on the basis that, that individual or entity has the third party's consent for AIB to collect and handle the third party's personal information in accordance with this Privacy Policy.
- 1.11 If AIB is unable to collect the personal information AIB requires, or the information provided is incorrect or incomplete, this may affect AIB's ability to provide products or services to an individual (such as enrolment in a course or the supply of appropriate information).

## **2. Use of Personal Information**

- 2.1 AIB will use and disclose an individual's personal information for the purposes for which AIB collected it, to which an individual consents and for other related purposes that an individual would reasonably expect.
- 2.2 Generally, the personal information that AIB collects is used by AIB or its contractors, representatives, advisers and agents for the primary purpose of providing a business and management education service and for related purposes which include but are not limited to:
- (a) Marketing AIB products and services (including marketing analysis) to past, current and potential students and graduates;
  - (b) Communicating with past, current and potential students, staff, graduates, alumni, suppliers and enforcement bodies;
  - (c) Performing various administrative functions including admissions, enrolments, teaching, proctoring online exams, marking and moderation of assessments, maintenance of business records including student and other records, addressing

- appeals and grievances, data storage, customer service, market profiling and statistical purposes;
- (d) Providing data on student academic progress to AIB staff involved in supporting student academic progress;
  - (e) Compliance with AIB's legal and insurance obligations;
  - (f) Mandatory reporting obligations to government agencies;
  - (g) Recruiting and managing staff and contractors;
  - (h) Engaging and monitoring the performance of suppliers; and
  - (i) Providing data as required by relevant authorities and third parties, including those listed in section 3.2 below.
- 2.3 AIB may use the personal information of individuals to provide them with marketing and promotional offers or information about new products, services and events. An individual agrees that AIB may send an individual such information by post or by electronic means (including e-mail and SMS). Where an individual no longer wishes to receive such marketing information from AIB, they can opt-out using the opt-out mechanism in one of AIB's communications (such as clicking the "unsubscribe" link on the marketing related email) or by contacting AIB. Individuals who do not unsubscribe will be taken to have consented to such marketing information being sent to them pursuant to AIB's terms and conditions.
- 2.4 Sensitive information will not be used for direct marketing or promotions unless an individual has expressly consented to it.
- 2.5 Apart from the above instances, AIB may also use and disclose personal information as otherwise required or permitted by law.
- 2.6 All persons providing personal information to AIB are taken to consent to the use and disclosure of their personal information for the purposes stated in this section 2.

### **3. Disclosure of Personal Information**

- 3.1 AIB will not disclose personal information, including sensitive information, without an individual's consent, unless required or permitted by law.
- 3.2 AIB is required to disclose relevant personal information to the following:
- (a) The Tertiary Education Quality Standards Agency (TEQSA). A copy of TEQSA's privacy policy can be viewed at <http://teqsa.gov.au/privacy>;
  - (b) The Department of Education and Training, such as for Tuition Protection Services, obligations under the Higher Education Support Act and research undertaken for it by the Social Research Centre, which is an ANU business enterprise;
  - (c) The Department of Home Affairs, such as, in relation to regarding any visa requirements; and
  - (d) Other Government agencies and enforcement bodies, such as Commonwealth Government assistance with FEE-HELP, Centrelink or the Australian Taxation Office, as well as their contractors, representatives and agents.
- 3.2 AIB students are taken to have consented to AIB sharing with markers and their staff personal information, and information regarding grades and assessments for the purpose of marking assessments.

- 3.3 AIB may disclose personal information to third party peer review, citation checking, grading and plagiarism prevention service providers (including online providers) for academic, conduct or administrative purposes, such as for improving or checking of referencing of authorship or academic integrity.

#### **4. Cross Border Disclosure of Personal Information**

- 4.1 From time to time, AIB may disclose personal information to overseas recipients (such as relevant government or regulatory authorities or contractors who provide services to AIB).
- 4.2 Whilst it is impracticable to list all countries to which AIB may disclose personal information, the countries in which such recipients may be located include, but are not limited to, Canada, New Zealand, European Union and the United States of America.
- 4.3 If personal information is disclosed overseas, the overseas recipient may not be subject to the Australian *Privacy Act* (including the Australian Privacy Principles) or to comparable privacy obligations in their jurisdiction. An overseas recipient may also be subject to a foreign law which could compel disclosure of personal information to a third party, for example, an overseas government or regulatory authority.
- 4.4 Generally, when personal information is disclosed to overseas recipients, AIB will take all reasonable steps to ensure that the overseas recipient handles the personal information in a manner consistent with the Australian Privacy Principles (or substantially similar law in the overseas location). If an individual consents to the disclosure in circumstances where AIB has informed an individual that AIB will not take any steps to ensure that the overseas recipient deals with personal information in accordance with the Australian Privacy Principles and the overseas recipient handles the information in breach of the Australian Privacy Principles, an individual will not be able to seek redress under the *Privacy Act*, may not be able to seek redress in the overseas jurisdiction and AIB will not be accountable under the *Privacy Act*.

#### **5. Integrity of Personal Information**

- 5.1 AIB takes all reasonable steps to ensure that:
- (a) The personal information it collects and discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure; and
  - (b) The personal information is protected, to the extent that is reasonable in the circumstances, from misuse, interference and loss, and from unauthorised access, modification or disclosure.
- 5.2 While all reasonable measures have been made to secure information transmitted to the AIB website, individuals should be aware that if they submit personal details, credit card numbers or other information, there is a possibility that this information may be observed by a third party while it is being transmitted.
- 5.3 Where the AIB website provides links to other websites, AIB is not responsible for the privacy practices or content of such websites.

- 5.4 Where the personal information is no longer necessary, AIB will dispose of it securely, if it is lawful and reasonable to do so.

## 6. Access to and Correction of Personal Information

- 6.1 Individuals including AIB's students have the right to access their personal information, subject to limited exceptions in the *Privacy Act* and to have it corrected if the personal information is inaccurate, out of date, incomplete, irrelevant or misleading.
- 6.2 Requests for access to or correction of personal information should be addressed to the Privacy Officer at [quality@aib.edu.au](mailto:quality@aib.edu.au). The Privacy Officer will respond to such requests within 20 working days of receipt.
- 6.3 No fee will be incurred for requesting access, but if an individual's request for access is accepted AIB will inform an individual of the fee (if any) that will be payable for providing access if an individual proceeds with their request.
- 6.4 Access to personal information may be denied by AIB in some circumstances, as specified in the *Privacy Act*. If access is denied, AIB will provide an individual with a written reason for the refusal.
- 6.5 If AIB refuses to correct the personal information as requested by an individual, AIB will give an individual a written notice that sets out the reasons for the refusal (except to the extent that it would be unreasonable to do so), the mechanisms available to complain about the refusal and any other matter prescribed by the regulations.
- 6.6 Notwithstanding anything else contained in this section 6 to the contrary:
- (a) Individual students are able to view their AIB student file on request.
  - (b) Any document which is marked confidential or which contains information on another student, will be removed before viewing and replaced by a brief description of the document removed. If students require photocopies of documentation viewed at AIB offices, charges may be levied, and
  - (c) Students will not be given copies of their examination scripts or other assessments but they will be permitted to view them at the AIB offices in the presence of a staff member in accordance with this policy.

## 7. Complaints

- 7.1 Individuals who believe that a breach of their privacy has occurred or otherwise have a complaint about the use of their personal information should make a complaint in writing to:
- Privacy Officer  
Australian Institute of Business  
27 Currie Street  
Adelaide South Australia 5000  
Or by email: [quality@aib.edu.au](mailto:quality@aib.edu.au)
- 7.2 Within 10 working days after details of the complaint are received by AIB, AIB will provide a written notice that acknowledges the making of the complaint and will set out how AIB will deal with the complaint.

7.3 The Privacy Officer will review and provide a substantive response to the complaint within 20 working days of receipt. Individuals are encouraged to contact the Privacy Officer to discuss their concerns.

7.4 Any individual who is not satisfied with the outcome of the complaint may refer the matter to the Office of the Australian Information Commissioner at:

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Phone: 1300 363 992.

## 8. Changes to AIB's Privacy Policy

AIB may amend, modify or replace this Privacy Policy at any time. Individuals that provide personal information or entities that provide third parties' personal information to AIB should review AIB's Privacy Policy each time they visit AIB's website or provide AIB with personal information.

### Related Policies:

AIB website Privacy Statement

Confidentiality Policy

Marketing and Community Relations Policy

Records Management Policy

### Responsibility:

Chief Executive Officer

<b>Current Status:</b>	<b>Version 6.1</b>
<b>Approved By:</b>	Board of Directors
<b>Date of Approval:</b>	5 March 2020
<b>Date Effective:</b>	<b>29 October 2019</b>
<b>Previous Version:</b>	2 October 2019 29 May 2019 27 November 2018 23 June 2016 4 February 2015 – V3 'Student Personal Information Policy' and 'Privacy and Personal Information Procedures' both superseded by the new 'Privacy Policy'. 1 July 2011 – V2 27 October 2008 – V1 'Student Personal Information Policy'
<b>Date of Next Review:</b>	2 October 2021