

**GOV-B05 Privacy
Policy V 2**

Policy Document

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1. Purpose

This policy establishes UNE Partnerships' framework for the collection, use, storage, disclosure, and disposal of personal information. It describes how UNE Partnerships safeguards the privacy of students, applicants, employees, contractors, website visitors, and other individuals whose personal information UNE Partnerships handles in the course of delivering services.

This policy reflects UNE Partnerships' obligations under:

- a. the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs)
- b. the Student Identifiers Act 2014 (Cth)
- c. the National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020
- d. applicable state and territory funding body requirements relating to the collection, use, and disclosure of student data
- e. the General Data Protection Regulation (EU/UK GDPR), where applicable.

2. Application

This policy applies to all business of UNE Partnership and must be followed by employees (permanent, temporary and casual), contractors, consultants, trainers and assessors, Board members, and any other individuals engaged by UNE Partnerships in any capacity (hereafter “team members”). It applies during all work-related activities and in all contexts, including on-site, during remote work, at client locations, and at any event where a team member is representing UNE Partnerships.

3. Definitions

Table 1: Definitions

Term	Definition
Australian Privacy Principles (APPs)	The 13 principles set out in Schedule 1 of the Privacy Act 1988 (Cth) that regulate the handling of personal information by Australian Government agencies and organisations.
Consent	Voluntary agreement to the collection, use, or disclosure of personal information, given by an individual who has been adequately informed of the purpose and consequences. Consent may be express or implied and may be withdrawn at any time.
Cookie	A small text file placed on a user's device by a website that collects information about browsing behaviour. Cookies do not access personal data stored on the device.
Data breach	Unauthorised access to, disclosure of, or loss of personal information that is likely to result in serious harm to one or more individuals, as defined under Part IIIC of the Privacy Act 1988 (Cth).

Term	Definition
De-identification	The process by which personal information is altered so that it is no longer about an identifiable individual or an individual who is reasonably identifiable, as defined in section 6 of the Privacy Act 1988 (Cth).
Disclosure	The release of personal information to a third party, whether intentional or accidental, where the third party does not already have access to that information.
GDPR (General Data Protection Regulation)	Regulation (EU) 2016/679 of the European Parliament and of the Council, which governs the processing of personal data of individuals located in the European Union and, as retained in UK law, the United Kingdom.
Legitimate interest	A lawful basis for processing personal data under the GDPR (Article 6(1)(f)), where processing is necessary for the purposes of a legitimate interest pursued by the data controller, provided it does not override the fundamental rights and freedoms of the individual.
Minor	An individual under the age of 18 years.
NCVER (National Centre for Vocational Education Research)	The national body responsible for collecting, managing, analysing, and communicating research and statistics on the Australian vocational education and training sector.
OAIC (Office of the Australian Information Commissioner)	The independent Australian Government agency responsible for oversight of privacy, freedom of information, and information policy, including handling complaints under the Privacy Act 1988 (Cth).
Personal Information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether recorded in a material form or not, as defined in section 6 of the Privacy Act 1988 (Cth). Under the GDPR, 'personal data' means any information relating to an identified or identifiable natural person. These term 'Personal Information' is used in this policy to refer to either Personal Data or Personal Information.
Personnel	Employees, contractors, consultants, volunteers, and any other individuals engaged by UNE Partnerships to perform work-related activities, regardless of location or employment status.
Pixel	A small, transparent image embedded in a webpage or email that tracks user behaviour, such as whether an email has been opened or a webpage visited.
Privacy Officer	The UNE Partnerships staff member responsible for overseeing compliance with this policy, responding to privacy enquiries and complaints, and managing data breach notifications.
Processing	Any operation or set of operations performed on personal data, including collection, recording, organisation, storage, adaptation, retrieval, use, disclosure, or destruction. This term is used primarily in the context of GDPR obligations.

Term	Definition
Pseudonymisation	The processing of personal data in such a manner that it can no longer be attributed to a specific individual without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure non-attribution, as defined in Article 4(5) of the GDPR.
RTO (Registered Training Organisation)	An organisation registered by the National VET Regulator (ASQA) to deliver nationally recognised training and assessment services and issue AQF qualifications and statements of attainment.
Third party	Any individual, organisation, or entity other than UNE Partnerships and the individual whose personal information is being handled.
USI (Unique Student Identifier)	A reference number assigned to an individual student under the Student Identifiers Act 2014 (Cth), required for the issuance of nationally recognised VET qualifications and statements of attainment.
VET Regulator	The National Vocational Education and Training Regulator, being the Australian Skills Quality Authority (ASQA), responsible for the registration and regulation of training providers under the National Vocational Education and Training Regulator Act 2011 (Cth).

4. Collection of personal information

This section explains the type of personal information that UNE Partnerships collects.

- a. In the course of delivering educational services, managing its website, and administering employment and contractual relationships, UNE Partnerships may collect the following information, collectively known as Personal Information:
 - name, date of birth, and residency status
 - contact details, including email address, telephone number, and postal address
 - geographic location and IP address
 - company or employer name
 - information provided in support of an application or enrolment
 - Unique Student Identifier (USI)
 - billing address and payment information (credit card details are processed through a secure third-party payment gateway and are not retained by UNE Partnerships)
 - survey responses, support queries, blog comments, and social media handles
 - other information reasonably necessary for the provision of services
- f. For employees and contractors, UNE Partnerships collects personal information necessary for recruitment, payroll, performance management, compliance with employment laws, and ongoing

human resources management. Personal information collected and retained, in addition to that noted in the above point, may include:

- banking and superannuation account details
- Tax File Number
- emergency contact details
- Police Criminal History Checks
- Working with Children checks
- employment history
- qualification verification.

g. Information is collected through UNE Partnerships website:

- When an individual visits the UNE Partnerships website, certain information is collected automatically through cookies, pixels, and similar technologies. This information is used to operate and improve the website and does not, by itself, identify the individual.

Definition: A cookie is a small file placed in a web browser that collects information about browsing behaviour. Use of cookies allows a website to tailor its configuration to the user's needs and preferences. Cookies do not access information stored on a user's computer or any Personal Information (e.g., name, address, email address, or telephone number). Most web browsers automatically accept cookies, but users may choose to reject cookies by changing browser settings. This may, however, prevent full use of the UNE Partnerships website.

- The UNE Partnerships website uses cookies to analyse website traffic, provide social media sharing and liking functionality, and support an improved website visitor experience.
- Cookies and pixels may be used to serve relevant advertisements to website visitors through third-party services such as Google Ads and Facebook Ads. These advertisements may appear on the UNE Partnerships website or on other websites the user visits.

h. UNE Partnerships does not knowingly collect Personal Information from a minor without parent or guardian consent. If UNE Partnerships becomes aware that a minor has provided Personal Data without authorisation from a parent or guardian, that information will be deleted as quickly as possible. Parents or guardians who believe a child has provided Personal Data without consent are encouraged to contact UNE Partnerships at education@unep.edu.au.

5. Use of personal information

This section details how personal information collected by UNE Partnerships is used.

a. UNE Partnerships uses the personal information it collects to deliver services and managed its operations, including:

- communicating with individuals about their studies, employment, engagement or other relationship with UNE Partnerships, which may include contact by email, phone, SMS, or other agreed channels

- administering enrolments, employment, contracts and related obligations
 - providing technical support, notifying individuals of updates and offers, and sharing useful content
 - measuring satisfaction, diagnosing problems, and providing a personalised website experience.
- b. Marketing communications are sent only with the individual's consent. Consent may be withdrawn at any time, including by opting out of newsletters and email promotions by following the instructions in those communications or by contacting UNE Partnerships directly.
- c. UNE Partnerships also uses information in aggregated and de-identified forms to improve its services, including:
- administering the UNE Partnerships website
 - producing reports and analytics
 - advertising UNE Partnerships' products and services
 - identifying user demands and assisting in meeting needs generally.
- d. Any information an individual chooses to make publicly available, such as blog comments and testimonials on the UNE Partnerships website, will be available for others to see. If that information is subsequently removed, copies may remain viewable in cached and archived pages on other websites or where others have copied or saved the information.

6. Storage and security of personal information

UNE Partnerships takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, and disclosure.

- a. UNE Partnerships implements appropriate technical, administrative, and physical safeguards to protect Personal Information from misuse, loss, or unauthorised access. These safeguards include:
- password protection, encryption, secure servers, and access controls.
 - restricting access to personal information to authorised personnel who require it to perform their duties
 - storing electronic records in access-controlled systems with appropriate authentication
 - maintaining physical security measures for any paper-based records
 - applying information security controls aligned with relevant government frameworks including the Australian Government Information Security Manual (ISM) and the ASD Essential Eight mitigation strategies, where required by contractual or regulatory obligations
- b. Credit card information is encrypted before transmission and is not stored by UNE Partnerships. Credit card details are processed by a secure third-party payment gateway.
- c. Where Personal Information is transferred and processed outside Australia, this occurs only in countries with adequate privacy protections. UNE Partnerships ensures that third-party providers comply with equivalent privacy standards.

- d. Personal information is retained only for as long as necessary to fulfil the purposes for which it was collected, to comply with legal obligations, to resolve disputes, or to enforce agreements, after which it is securely deleted or de-identified. Specific retention periods are set out in UNE Partnerships' Records and Data Management Policy (RTO-005).
- e. In the event of a data breach that compromises Personal Information, UNE Partnerships will promptly notify affected individuals in compliance with the applicable law.

7. Sharing personal information with third parties

- a. As a Registered Training Organisation, UNE Partnerships is required to comply with the National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020. As a result, UNE Partnerships may be required to disclose Personal Information to the following entities:
 - the VET Regulator (ASQA), to ensure compliance with registration requirements and to maintain the integrity of the national training system
 - the National Centre for Vocational Education Research (NCVER), for the collection, management, and analysis of national VET statistics and research
 - state or territory funding bodies, where required under the terms of applicable funding agreements.
- b. UNE Partnerships is also required to collect, verify, and disclose Unique Student Identifiers (USIs) in accordance with the Student Identifiers Act 2014 (Cth).
- c. Personal Information is otherwise disclosed to third-party suppliers only when:
 - it is required by law
 - it is necessary for goods or services the individual has purchased
 - it is necessary for payment processing
 - it is necessary to protect UNE Partnerships' copyright, trademarks, or other legal rights.
- d. To the extent that UNE Partnerships shares Personal Information with a service provider, it does so only where that party has agreed to comply with UNE Partnerships' privacy standards as described in this policy and in accordance with applicable law. Contracts with third parties prohibit them from using Personal Information for any purpose other than that for which it was shared.
- e. UNE Partnerships does not sell or deal in Personal Information or any customer information.

8. Disclosure of personal information

- a. UNE Partnerships may from time to time need to disclose certain information, which may include Personal Information, to comply with a legal requirement such as a law, regulation, court order, subpoena, or warrant, in the course of a legal proceeding, or in response to a law enforcement agency request.
- b. UNE Partnerships may use Personal Information to protect the rights, property, or safety of UNE Partnerships, its customers, or third parties.

- c. If there is a change of control in one of UNE Partnerships' business operations (whether by merger, sale, transfer of assets, or otherwise), customer information, which may include Personal Information, could be transferred to a purchaser under a confidentiality agreement. UNE Partnerships will only disclose Personal Information in good faith and where required by any of the above circumstances.

9. Links to other websites

- a. The UNE Partnerships website may contain links to other websites. These links are provided for convenience only. Links to third-party websites do not constitute sponsorship, endorsement, or approval of those websites. UNE Partnerships is not responsible for the privacy practices of other websites. Individuals are encouraged to read the privacy statements of each website that collects personally identifiable information.

10. Making a privacy complaint

- a. Individuals who wish to make a complaint about the handling of their personal information are encouraged to contact the UNE Partnerships Privacy Officer at education@unep.edu.au.
- b. Privacy complaints are managed in accordance with UNE Partnerships' Complaints and Appeals Procedure (RTOPR-007).
- c. If the individual is not satisfied with UNE Partnerships' response, they may contact the Office of the Australian Information Commissioner (OAIC).

11. Additional rights for EU and UK residents

- a. If an individual is a resident of the EU or UK, that individual has certain rights and protections under the GDPR regarding the processing of Personal Data (referred to in this policy as Personal Information).
- b. UNE Partnerships collects, uses, and stores Personal Information to enable the provision of goods, services, and related information. Processing of Personal Information is carried out based on the following lawful bases under the GDPR:
 - performance of a contract
 - compliance with legal obligations
 - legitimate interests
 - consent
 - protection of vital interests.
- c. Residents of the EU or UK have the following rights under the GDPR:
 - right to be informed
 - right of access
 - right to rectification
 - right to object

- right to restriction of processing
 - right to erasure or to be forgotten
 - right to data portability
 - right not to be subject to automated processing.
- d. Individuals who wish to access their Personal Information, request correction, limit or request deletion of their Personal Information, or exercise any other right under the GDPR may do so by contacting UNE Partnerships. Individuals may also choose their preferred method of communication and, where applicable, opt out of receiving marketing communications by email, SMS, or phone at any time.
- e. UNE Partnerships ensures the encryption and pseudonymisation of Personal Information processed under GDPR obligations and maintains adequate cyber security measures.
- f. All Personal Information stored on UNE Partnerships' platform is treated as confidential, stored securely, and accessed only by authorised personnel. Collection is limited to what is necessary for the purpose for which the Personal Information is processed, and data is kept only for so long as is necessary for that purpose.

12. Consent

This section covers consent, disclosure and withdrawing of consent.

12.1 Consent and disclosure

- g. By providing personal information to UNE Partnerships, individuals consent to its collection, use, and disclosure in accordance with this policy. Where personal information is collected for a specific purpose, such as enrolment, employment, or access to services, it will be used for that purpose and for directly related purposes the individual would reasonably expect.
- h. UNE Partnerships may disclose personal information to third parties where necessary to fulfil the purposes for which it was collected, including to:
- government agencies and regulators, including the Australian Skills Quality Authority (ASQA), the National Centre for Vocational Education Research (NCVER), and the Department of Defence, as required by law or contractual obligation
 - the University of New England, in connection with programs delivered in partnership
 - third-party service providers engaged by UNE Partnerships to support its operations, such as cloud storage, learning management, payment processing, and communication platforms
 - professional bodies, licensing authorities, or employers, where required for the verification of qualifications or competency outcomes
 - any other party where the individual has given express consent or where disclosure is required or authorised by law.

- Where personal information is disclosed to a third-party service provider, UNE Partnerships takes reasonable steps to ensure the provider handles the information consistently with the Australian Privacy Principles.
- UNE Partnerships stores personal information within Australia. Where personal information is transferred to or accessed from a location outside Australia, UNE Partnerships takes reasonable steps to ensure the overseas recipient handles the information in accordance with the Australian Privacy Principles, as required by APP 8.

12.2 Withdrawing consent

- i. An individual may withdraw consent to UNE Partnerships' collection or processing of their Personal Data at any time. Marketing communications are sent only with consent, and individuals may opt out by following the instructions in those communications or by contacting UNE Partnerships directly.
- j. If an individual withdraws consent to the use of their Personal Information, that individual may not have access to UNE Partnerships' services, and UNE Partnerships may not be able to provide services to that individual. In some circumstances, where UNE Partnerships has a legal basis to do so, processing may continue after consent has been withdrawn. For example, if it is necessary to comply with an independent legal obligation or to protect UNE Partnerships' legitimate interest in keeping its services secure.

13. Obligations of UNE Partnerships 'team members'

The requirements of this policy apply to all UNE Partnerships 'team members'.

- k. All staff, contractors, and other personnel engaged by UNE Partnerships must handle personal information in accordance with this policy, the Australian Privacy Principles, and any applicable legislation, contractual obligations, or internal procedures.
- l. Staff and contractors must:
 - access personal information only where necessary to perform their duties
 - not disclose personal information to any person or organisation unless authorised to do so in the course of their duties or required by law
 - not access the personal information of students, clients, or other staff members without a legitimate work-related purpose
 - take reasonable steps to protect personal information from misuse, loss, unauthorised access, or disclosure
 - report any suspected or actual breach of this policy, or any suspected data breach, to their manager or the Privacy Officer as soon as practicable.
- m. Obligations under this policy continue after an individual's employment or engagement with UNE Partnerships ends.

- n. Failure to comply with this policy may be a breach of the Code of Conduct and could result in disciplinary action, up to and including termination of employment and may also constitute a breach of applicable law.

14. References and document control

This section details policies and procedures, relevant legislation and standards, ownership, approvers and the version history details. Relevant legislation and standards are provided as the regulatory basis for this policy and the related procedures. Personnel are not expected to be conversant with the original legislative instruments; instead, they must adhere to the practical guidance and obligations outlined directly in this policy and its supporting procedures.

This policy is subject to change. UNE Partnerships may modify this policy at any time, and all modifications will be effective immediately upon posting on the UNE Partnerships website. Individuals are encouraged to review this policy periodically.

Table 1: References

Reference type	Details
Legislation and standards	Privacy Act 1988 (Cth) Australian Privacy Principles (APPs) Student Identifiers Act 2014 (Cth) National Vocational Education and Training Regulator Act 2011 (Cth) National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020 General Data Protection Regulation (EU) 2016/679 Standards for Registered Training Organisations 2025
UNE Partnerships policy	RTO-05 Records and Data Management Policy RTO-07 Marketing and Communications
UNE Partnerships procedure	RTO-06B Complaints and Appeals Procedure RTO-05B Student Information Handling Procedure

Table 2: Document control

Document control	Details
Owner	Director Quality Assurance and Compliance
Approver/s	Board of Directors
Current version	V 2
Date of initial approval	March 2020
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Date of next review	30 September 2029

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