



Privacy and Data Protection Policy

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| Regulatory Requirements: | <p>This policy is informed by the requirements of:</p> <ul style="list-style-type: none"> • The Education Services for Overseas Students (ESOS) Act 2000 • The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018 • Higher Education Support Act 2003 • Tertiary Education Quality and Standards Act 2011 • National Vocational Education and Training Regulator Act 2001 • Privacy Act 1988 • Privacy Amendment (Notifiable Data Breaches) Act 2017 • European Union’s General Data Protection Regulation (GDPR) 2016 • Basilian General Data Protection Legislation (LGPD) 2020 | |

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PURPOSE

Greenwich English College (GEC) and its subsidiary brand (Greenwich Management College) [forthwith are referred to collectively as the “Company”] have developed this policy in order to ensure compliance with its obligations regarding the collection, use, disclosure, retention and protection of personal information of all students (prospective and actual) and employees.

This policy replaces any and all previous Privacy Policies.

SCOPE

This Policy applies to all personal information collected by the Company in the course of its business. It applies to all employees and students of the Company.

POLICY

1. Collection and Retention of Information

1.1. The Company may collect for inclusion in a record and hold the following types of personal information:

- Name, address, date of birth and other relevant information about students that are



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collected in the course of their selection and enrolment with the company to enable proper

administration of the students course of study and contact with the student before, during or after the students course of study, the Company's internal planning requirements, the organisation and coordination of relevant health and welfare programs, facilitation of alumni activities, government and regulatory reporting and administration of funding assistance, payment plans and government loans schemes;

- 1.1.2. Information disclosed by users of the Company's information technology systems (which are typically systems which store data), collected in the ordinary course of those users' use of such systems;
- 1.1.3. Name, address, date of birth and information or opinion about character, capabilities, performance and other attributes of staff and potential staff members and potential and actual contractors, and tax identifiers, bank account details and insurance information (including worker's compensation insurance information) about contractors, that are collected in the course of recruitment of and employment of staff members or the selection or engagement of and dealing with contractors;
- 1.1.4. Name, address, financial product holdings and dealings, bank account details, and tax and other identifiers of holders (or potential holders) of financial products issued by the Company, that are collected in the course of responding to applications for the acquisition of the financial product, maintaining existing relationships with holders and maintaining security registers (including external security registers, or as may be required by the Corporations Act 2001 (Cth));
- 1.1.5. Name, address, email address and information about roles, means of communication with and personal attributes of officers, employees, contractors, and representatives of corporations and entities with whom the Company deals, that are collected incidentally in the course of dealing with those corporations and entities.

1.2. The Company may collect or hold sensitive information as required by: Australian law; by a Government department or agency; or in order to fulfil its employee obligations, domestic student obligations, its international student visa obligations, or comply with the policies of the Company. Unless the collection is required by Australian law, the Company will obtain consent from the individual before it collects sensitive information.

1.3. If the Company receives unsolicited information (including sensitive information) about individuals from the individual or from other persons, the Company will only collect and hold the information in a record if it is reasonably necessary for the Company's functions or activities and will hold such information in accordance with the Privacy Act and any requirements of laws of countries and territories that may apply to Australian companies from time to time.

1.3.1. Should an individual request that data collected be deleted from the Company's data storage systems, unless required to retain such information under Australian law or by a Government department or agency, the Company will comply with this request.

1.3.2. Where collected data is no longer required to be retained under Australian law or by a Government department or agency this data will be deleted.

1.4. The Company will use only lawful and fair means of collecting personal information.

1.5. The information set out in 1.1 (a), (b), (c), and (d) may be held in either/and hard copy and as electronic records and the information set out in paragraph 1.1 (e) is held electronically. Where information is held in electronic records or electronically, it will be held in data storage systems which permit lawful access by only those Company staff members who need access to the information in order to perform their functions.

2. Use and Disclosure of Information

2.1. The Company uses and discloses the above types of information only for the following purposes:

- 2.1.1. Delivering the Companies services including educational services and other activities as provided from time to time;
- 2.1.2. Providing student recruitment services;
- 2.1.3. Promoting Company services;



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- 2.1.4. Administration of the Company's business including the selection, recruitment, teaching and assessment of students, administration of students' courses of study, regulatory reporting, internal planning requirements, the organisation and coordination of health and welfare programs, facilitation of alumni activities, receiving and making payments, and communication with individuals concerned; and
 - 2.1.5. Complying with the Company's legal obligations.
 - 2.2. The Company will generally not disclose personal information to anyone except:
 - 2.2.1. In the manner described in this Policy;
 - 2.2.2. When the individual consents to a particular disclosure; or
 - 2.2.3. Where the identifying data can be removed.
 - 2.3. The Company will disclose personal information to third parties only for the purposes discussed in this Policy. When the Company discloses personal information to third parties, the Company will make all reasonable attempts to ensure it discloses only relevant information and that it is accurate, complete and up to date and that third parties commit to complying with the Privacy Act and equivalent legislation in other territories (if applicable).
 - 2.4. There may be disclosures where:
 - 2.4.1. The individual would reasonably expect the disclosure to occur (for example quality assurance purposes, training and the purpose of enhancing the Company's services);
 - 2.4.2. It is required for the Company to recover unpaid fees owing it;
 - 2.4.3. The Company is authorised or compelled by law to disclose;
 - 2.4.4. It will prevent or lessen a serious threat to someone's life, health or safety or a threat to public health or safety;
 - 2.4.5. It is necessary to take appropriate actions in relation to any suspected unlawful activity or serious misconduct;
 - 2.4.6. It is necessary to locate a missing person, subject to compliance with rules made by the Australian Information Commissioner;
 - 2.4.7. It is a necessary as part of the establishment, exercise or defence of a legal claim;
 - 2.4.8. It is requested by an enforcement agency such as the police;
 - 2.4.9. It is necessary part of an investigation following a complaint or incident; or
 - 2.4.10. It is necessary for a confidential alternative dispute resolution process.
 - 2.5. The Company is unlikely to disclose personal information overseas except as may be necessary or appropriate to the Company's business in the event that a student or potential student is located outside of Australia will be dealing with a third party agent contracted by the Company to recruit students on its behalf and the services offered by that agent may be located outside of Australia. The Company will disclose personal information overseas only if the individual consents or if the Company reasonably believes that the personal information is protected overseas in a substantially similar way to its protection under the privacy laws and privacy principles that apply to the Company in Australia, (and where the individual is domiciled in a European Union country is handled in accordance with European Union law);
 - 2.6. The Company has processes in place to ensure that the records of personal information remain accurate, complete and up to date. The Company has systems and procedures in place to protect personal information from misuse or loss, and from unauthorised access, modification or disclosure.
 - 2.7. If the personal information is no longer required by the Company for any purpose for which it was collected or the Company is no longer able to ensure that the personal information is accurate, complete or up to date and it is no longer required by law to be retained by the Company, the Company will permanently destroy or de-identify the personal information.
- 3. Access and Correction of Information**
- 3.1. The Company has measures in place to ensure that the personal information it holds is accurate, complete and up to date before acting on it. If an individual learns that personal information the Company holds about the individual, such as address and contact details, is inaccurate, incomplete or



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not up to date the individual should contact the Company so that the information can be promptly updated in order to maintain the accuracy and completeness of the individual's personal information and to ensure that any communications are correctly addressed. In the case that the student holds a student visa they are required to do so within 7 days of any changes to details in accordance with Australian visa requirements.

- 3.2. If an individual wishes to see what information the Company holds about the individual, the individual may contact the Company and ask for a copy. Sometimes it may not be possible for the Company to provide a copy of the information if it was provided anonymously, if it contains details about other people that the individual making the request is not authorised to access, or if it would be unsafe to provide the information because it may lead to harm being done against another person.
- 3.3. If the Company refuses to provide an individual with access to the individual's record or to update the record in the way the individual requests, the Company will provide written reasons.
- 3.4. If the Company refuses to correct or update an individual's personal information, the individual may request that the Company make a note on the record that the individual is of the opinion that the information is inaccurate, incomplete, out of date, irrelevant or misleading, as the case may be.
- 3.5. The Company will not charge the individual for lodging a request for a copy of the individual's personal information but may ask the individual to pay a reasonable fee for the work involved in providing the information and for any associated costs such as printing. The individual will be notified of any likely costs before the request is processed.

4. Privacy Complaints

- 4.1. If an individual has a privacy complaint or concern, specially of the individual thinks that the individual's privacy has been affected or the individual wishes to complain about the Company's refusal to update or grant the individual access to their personal information, the individual should contact the Company's privacy officer who will examine the complaint. If the individual is dissatisfied with how the Company's privacy officer deals with the complaint, the individual can subsequently complain about the privacy matter to the Australian Information Commissioner. See www.aic.gov.au for further information about how to make a complaint.

5. Reporting Breaches

- 5.1. Any breach of this policy or of data protection laws must be reported as soon as practically possible. This means that as soon as you have become aware of a breach it is important to notify us.
- 5.2. All members of staff have an obligation to report actual or potential data protection compliance failures. This allows the Company to:
 - 5.2.1. Investigate the failure and take remedial steps as required
 - 5.2.2. Maintain a register of compliance failures
 - 5.2.3. Notify the Office of the Australian Information Commissioner of any compliance failures that are material either in their own right or as part of a pattern of failures within 30 days.
 - 5.2.4. Any member of staff who fails to notify of a breach, or is found to have known or suspected a breach has occurred but has not followed the correct reporting procedures will be liable to disciplinary action.

6. Audits, Monitoring and Training

- 6.1. Regular data audits are scheduled in order to maintain data integrity and both manage and mitigate risks. The outcomes will be recorded in the data register. This register contains information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.
- 6.2. The Data Protection officer (DPO) has overall responsibility for this policy. The Company will keep this policy under review and amend or change as required from time to time.

7. Privacy Notice - EU and Brazilian Citizens Only

- 7.1. When collecting the personal information of European Union citizens this data will be protected, retained, and managed in accordance with the requirements of the General Data Protection



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Requirements as well as the Privacy Act 1988 (Cth) and the Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth) requirements. Information collected will only t]be that data as determined to be necessary to enrol students into courses and in accordance with the requirements of government departments and agencies.

7.2 When collecting the personal information of Brazilian citizens this data will be protected, retained, and managed in accordance with the requirements of the General Data Protection Law (LGPD) as well as the Privacy Act 1988 (Cth) and the Privacy Amendment (Notifiable *Data Breaches*) Act 2017 (Cth) requirements. Information collected will only be that data as determined to be necessary to enrol students into courses and in accordance with the requirements of government departments and agencies.

8. Contact Privacy Officer

8.1. For further information on this policy or to lodge a privacy complaint, please contact the Company's privacy officer on the contact details below:

8.2.

Privacy Officer

Email: privacyofficer@redhilleducation.com

Phone: +61 2 83553820

REFERENCE AND SUPPORTING INFORMATION

Definitions

| Term | Definition |
|--|--|
| Personal information | This 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. Personal information collected by the Company may include (but is not limited to) the following: Name; email address; contact details; Tax File number, visa details, passport details; education history; course and unit enrolment details; if applying for a job with the Company information from your resume or job application. |
| Special categories of personal information | This includes information about an individual's racial or ethnic origin, religious or similar beliefs, physical or mental health or condition, criminal offences, or related proceedings. Any special category of personal data is only collected in accordance with regulatory requirements. Any use of special categories of personal data will only be used under strict controls and in accordance with this policy. |

Supporting Documentation

| Document Name | Document Type | Location |
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| USI Privacy Notice | Policy | www.greenwich.edu.au |
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