



# Privacy Policy

## 1. Purpose

- 1.1 RedHill Education Limited (**'the Company'**) has developed this Privacy Policy (**'the Policy'**) in order to ensure compliance with its obligations regarding the collection, use, disclosure and retention of personal information.
- 1.2 The Company is committed to complying with the Australian Privacy Principles under the *Privacy Act 1988* (Cth) (**Privacy Act**).

## 2. Scope

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

## 3. Collection and retention of information

- 3.1 The Company may collect for inclusion in a record and hold the following types of personal information:
  - (a) 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 dealings with contractors;
  - (b) name, address, date of birth and other relevant information about students that are collected in the course of their selection and enrolment with the Company to enable the proper administration of the student's course of study and contact with the student before, during or after the student's 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;
  - (c) 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 securities registers, or as may be required by the *Corporations Act 2001* (Cth));

- (d) 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; and
  - (e) 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.
- 3.2 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 and 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.
- 3.3 If the Company receives unsolicited personal 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 only in accordance with the Privacy Act.
- 3.4 The Company will use only lawful and fair means of collecting personal information.
- 3.5 The information set out in paragraph 3.1(a), (b), (c) and (d) are held in hard copy and as electronic records and the information set out in paragraph 3.1(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.

#### **4. Use and disclosure of information**

- 4.1 The Company uses and discloses the above types of information only for the following purposes:
- 4.1.1** delivering the Company's services including providing English language courses, animation, interactive media, games design, colour and interior design courses, and other courses provided from time to time by the Company;
  - 4.1.2** providing student recruitment services;
  - 4.1.3** promoting the Company's services;
  - 4.1.4** administration of the Company's business including the selection, recruitment, teaching and assessment of students, administration of students' course of study, regulator reporting, funding assistance reporting, visa compliance reporting, internal planning requirements, the organisation and coordination of health and welfare programs,

facilitation of alumni activities, receiving and making payments, and communicating with individuals concerned; and

**4.1.5** complying with the Company's legal obligations.

4.2 The Company will generally not disclose personal information to anyone except:

**4.2.1** in the manner described in this Policy;

**4.2.2** when the individual consents to a particular disclosure; or

**4.2.3** where the identifying data can be removed.

4.3 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 efforts to ensure it discloses only relevant information and that it is accurate, complete and up to date and that the third parties commit to complying with the Privacy Act (if applicable).

4.4 There may be other disclosures where:

**4.4.1** the individual would reasonably expect the disclosure to occur (for example, quality assurance purposes, training and the purpose of enhancing the Company's services);

**4.4.2** it is required for the Company to recover any unpaid fees owing to it;

**4.4.3** the Company is authorised or compelled by law to disclose;

**4.4.4** it will prevent or lessen a serious threat to someone's life, health or safety or a threat to public health or safety;

**4.4.5** it is necessary to take appropriate actions in relation to any suspected unlawful activity or serious misconduct;

**4.4.6** it is necessary to locate a missing person subject to compliance with rules made by the Australian Information Commissioner;

**4.4.7** it is necessary as part of the establishment, exercise or defence of a legal claim;

**4.4.8** it is requested by an enforcement agency such as the police;

**4.4.9** it is a necessary part of an investigation following a complaint or incident; or

**4.4.10** it is necessary for a confidential alternative dispute resolution process.

4.5 The Company is unlikely to disclose personal information overseas except disclosure as may be necessary or appropriate to the Company's business unit GoStudy in the event that a student or potential student will be dealing with GoStudy and the services offered by GoStudy. 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.

- 4.6 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 and loss, and from unauthorised access, modification or disclosure.
- 4.7 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.

## **5. Access and correction of information**

- 5.1 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 not up to date the individual should contact the Company so that the information can be promptly updated to maintain the accuracy and completeness of the individual's personal information and to ensure that any communications are correctly addressed to the individual.
- 5.2 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 might lead to harm being done to another person.
- 5.3 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.
- 5.4 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.
- 5.5 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 associated costs such as photocopying. The individual will be notified of any likely costs before the request is processed.

## **6. Privacy Notice - EU and Brazilian Citizens Only**

- 6.1 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 Requirements 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.
- 6.2 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.

## **7. Privacy complaints**

- 7.1 If an individual has a privacy complaint or concern, especially if 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 the individual's 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.oaic.gov.au](http://www.oaic.gov.au) as to how to make a complaint.

## **8. Contact the Privacy Officer**

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

Privacy Officer

Email: [privacyofficer@redhilleducation.com](mailto:privacyofficer@redhilleducation.com)

Phone: 02 8355 3820