

Privacy Policy	
<p><b>Relevant Standards</b></p> <ul style="list-style-type: none"> <li>• <i>National Code 2018 Part B, Standard 3</i></li> <li>• <i>Privacy Act 1988</i></li> <li>• <i>Privacy Amendment (Enhancing Privacy Protection) Act 2012</i></li> <li>• <i>Standards for RTOs 2015 Clause 8.5</i></li> </ul>	<p><b>Linked Documents</b></p> <ul style="list-style-type: none"> <li>• <i>Change of Contact Details Notification Form</i></li> <li>• <i>Complaints and Appeals Policy and Procedure</i></li> </ul>

## 1. Policy Statement

Capstone Institute of Australia (CAPSTONE) is committed to always ensuring the privacy of its stakeholders, Students and Visitors. The National Privacy Principles (NPPs) contained in the Privacy Act 1988 and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* bind it.

## 2. Definitions

**Personal information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

*Source: Privacy Act 1988*

## 3. Purpose and Types of Information

CAPSTONE holds personal information for the following purposes:

- Processing of course enrolments
- Tracking course progress, attendance, assessment, and completion
- Issue of certification documentation on completion of courses
- Meeting legal and regulatory requirements

The information may include, but is not limited to:

- Names
- Addresses

- Dates of birth
- Contact details
- Citizenship
- Emergency contact details
- Previous education
- Training and assessment progress
- Attendance
- Payment/refund records
- Photographs

#### **4. Use and Disclosure**

CAPSTONE will not reveal, disclose, sell, distribute, rent, license, share or pass personal information on to a third party without the individual's knowledge and consent unless required by legislation or law.

CAPSTONE must disclose personal information to third parties, such as government and regulatory agencies, to provide students with training and assessment services for legal and regulatory requirements. Students are made aware of this as part of the enrolment process and the Student Agreement they sign.

CAPSTONE may use and disclose personal information to provide training and assessment services specified to the client at the point of collection or for another purpose if:

- The student would reasonably expect us to disclose it for that purpose.
- We reasonably believe the use is necessary to lessen or prevent a serious and imminent threat to an individual's life or health.
- We have reason to suspect that unlawful activity has been, or is being engaged in, and use the information as part of its investigation or in reporting its concerns to the relevant authority.
- An Australian law authorises the use and disclosure expressly.

CAPSTONE does not use or disclose personal information to directly market unrelated products or services.

#### **5. Data Quality and Security**

CAPSTONE will take reasonable steps to ensure that personal information is accurate, complete, and current. Students are encouraged to help us keep their personal

information accurate, complete, and up to date by informing us of any changes.

CAPSTONE is committed to protecting the privacy of personal information. It takes reasonable steps to protect personal information from misuse, loss, unauthorised access, modification, or disclosure.

CAPSTONE destroys information when it is no longer needed for its purpose or after the required retention period defined by Commonwealth and State legislation.

CAPSTONE will take all reasonable steps to ensure the security of physical files, computers, networks and communications.

## **6. Access and Correction of Personal Information**

Clients have a right to access the personal information we store about them. If they find that the information CAPSTONE holds about them needs to be updated, they can request in writing to correct it. If clients wish to access their information, then CAPSTONE request clients that they:

- Make a request formally in writing
- Provide sufficient formal identification
- Provide data storage if necessary
- Pay all reasonable costs associated with the provision of the data

Overseas Students' visa condition requires them to notify CAPSTONE of their change of contact details within seven days of the change. Students must email their notification or complete the *Change of Contact Details Notification Form*.

CAPSTONE processes requests within 20 working days.

## **7. Anonymity**

Where possible, CAPSTONE will allow individuals not to identify themselves when entering into transactions except for training, assessment and related activity.

## **8. Transfer of Data**

CAPSTONE will not transfer personal information to a foreign company unless required by law.

## **9. Sensitive Data**

CAPSTONE will only collect information of a sensitive nature with prior permission if

required to do so by the law.

## **10. Complaints and Disputes**

Individuals who feel their privacy has been interfered with due to a breach of our obligations concerning their privacy can lodge a grievance with us under our *Complaints and Appeals Policy and Procedure*.