

## Privacy

APEG recognises the importance of protecting the privacy of personal information collected about our customers and suppliers.

Our procedures for the handling of personal information uphold the principles of the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

### **COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION**

We will generally collect and hold your name and e-mail address when requesting information about our products or services.

#### **COLLECTION**

We will collect your personal information when you complete a request for more information on our website and otherwise we may collect your personal information in person, or by telephone or through written information that you submit to us.

We only collect personal information that we require for the purposes of our business functions and activities. If you provide us with personal information about a third party, you warrant that that third-party consents to us collecting and using their personal information in accordance with this Policy.

#### **USE & DISCLOSURE**

We will use and disclose personal information for the purposes for which we collected it, for other related purposes that you would reasonably expect, and as otherwise permitted or required by law.

By providing us with your personal information, you consent to us holding, using and disclosing your personal information for the following purposes: to provide our products and services to you; to communicate with you and provide information to you about our business, including to send you newsletters, surveys, offers and other promotional materials; and to respond to enquiries and provide you with information you have requested. We will not use or disclose your personal information other than with your consent.

We may disclose personal information to third party contractors who may be performing services for us, or a third party where we are required or authorised by law to do so. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do. We will not otherwise disclose your personal information to third parties without your consent.

## **SECURITY**

We use a range of industry-standard security measures to protect personal information from misuse, interference, loss or unauthorised use, modification or disclosure. We hold your personal information as either physical records, records on our servers, and in some cases, records on third party servers, which may be located overseas. We use the following security measures to protect personal information: passwords on all our computers; a firewall on our computer network, which is monitored; and virus protection software.

We will keep personal information as long as we need it for the purposes in clause 1.4 of this Policy, or as long as we are required by law to retain it, after which time we will destroy it or de-identify the personal information.

Our website may use cookies. We do not use the information stored in those cookies to collect information about you. You may configure your web browser to refuse or disable cookies. Our website may contain links to other websites. We are not responsible for the privacy practices or the use and protection of your personal information on those other websites. In terms of the privacy or security of personal information during transmission to our website, we implement and maintain industry specific standard security measures to best protect your personal information, however, please note that the security of transmission of information online cannot be fully guaranteed.

## **ACCESS & COLLECTION**

You may seek access to the personal information we hold about you by contacting our Privacy Officer at the details in this Policy. We may require you to provide us with sufficient identification before providing access to your personal information. If we are required or authorised by law to do so, we may refuse access.

We may charge a reasonable fee for you to access your personal information, but that fee will not exceed our reasonable costs of assessing your request and providing access. We will advise the amount once we have assessed your request, and we may require payment prior to providing access.

Access to your personal information may be provided in a number of ways, including by providing you with a hard copy of the information, or by allowing you to view our records. If you believe the personal information we hold about you is inaccurate, incomplete or out-of-date, irrelevant or misleading, please contact us at the details shown below. If you satisfy us that any personal information we hold about you is misleading or is not accurate, complete, up-to-date or relevant, we will amend our records accordingly.

## **CROSS-BORDER DISCLOSURES**

As at the date of this Policy, we are not likely to disclose personal information to overseas recipients. In future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act.

From time to time we may engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information. However, by providing us with your personal information, you consent to the storage of such information on overseas servers. For the avoidance of doubt, in the event that an overseas servers is breached, that entity will not be bound by, and you will not be able seek redress under, the Privacy Act.

We will only transfer your personal information outside of Australia, with your consent or where we are otherwise legally permitted or required to do so.

We request that any dispute or complaint be submitted in writing to our Privacy Officer.

We will confirm receipt of your complaint and your dispute or complaint will be investigated and we will respond to you within a reasonable time. If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner, see their website for further information.

## **AMENDMENTS**

This Policy is current as at 5 July 2019.

We reserve the right to amend this Policy at any time, without notice to you, to ensure that we maintain the highest standards. The date of this Policy will inform you as to whether there have been updates since your last visit.

Any Questions?

If you have any questions or concerns about our management of your personal information, or if you wish to update to correct your personal information, please contact our Privacy Officer at the details set out below:

### **Privacy Officer**

Australian Pathway Education Group  
Email: [enquiries@auspatheg.com](mailto:enquiries@auspatheg.com)

