



# PRIVACY POLICY

## 1. Preliminary Information

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### 1.1 Purpose

At Civil Train SA we are committed to ensuring that personal information provided to us by our staff, learners and stakeholders (you) is treated in a manner which protects the privacy of that information and complies with Australian Privacy Principles (APPs).

### 1.2 Scope

This document provides information on how we collect, use and manage personal information and applies to Civil Train SA's staff, learners and stakeholders.

## 2. Why we collect personal information

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Civil Train SA collects personal information in order to perform its core functions. Civil Train SA's core functions include provision of education, training and employment services. We also collect personal information that is required for meeting government reporting requirements.

You have the right of not providing us with personal information and not identifying yourself or using a pseudonym when dealing with us if it is lawful and practicable. For example you can deal anonymously or by pseudonym with us when making a general course enquiry. However, if you choose so, in some cases we might not be able to provide you with our services. For example, you must identify yourself when enrolling in our courses or enquiring on your subsidy eligibility.

## 3. Types of information we collect

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### 3.1 General

The kind of personal information we collect or hold depends on the purpose for which it is being collected. We might collect personal information such as your name, date of birth, current and previous addresses, telephone or mobile phone number, email address, gender, occupation, identification details (e.g. unique student identifier), complains details, proof of identity details, licenses' details, education and training history, billing information, information about services and products you supply, employment details and history, payment details, emergency contact details and business details.

### 3.2 Sensitive Information

Sensitive information is a type of personal information. It includes information about an individual's racial or ethnic origin, health information, political opinions, membership of a political association, professional or trade association or trade union, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices, criminal record, genetic information, biometric information that is to be used for certain purposes and biometric templates.

We collect only sensitive information where it is reasonably necessary for our activities and either:

- we have obtained your consent; or
- it is permitted by the law.

Sensitive Information we collect might include information about your ethnic/racial origin (for example indigenous status, language spoken at home, country of birth), health status (for example disability and long-term impairment status, dietary requirements, health and work injury information), tax file number, membership number and criminal records.

### 3.3 Cookies

When you access Civil Train SA's website ([www.civiltrainsa.com.au](http://www.civiltrainsa.com.au)) from a computer, mobile phone or other device, we may collect information about your visit including the user's server address, the user's domain name, IP address, the date and time of visit, the pages accessed and documents downloaded, the previous site visited, and the type of browser used. We may also track some of the actions you take on our website such as when you provide information or content to us. This information is not personal because it does not reveal your identity. We use cookies to make our website easier to use, to make our advertising better, and to protect both you and the secure areas of our website. You can remove or block cookies using the settings in your browser, but in some cases that may impact your ability to use the secure areas.

## 4. How we collect personal information

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### 4.1 Collection

We do our best to collect personal information directly from you. We collect personal information in different ways including by email, fax, over the phone, hard copy form (e.g. enrolment and registration form), through our website, through written correspondence. Where information is collected on the enrolment or registration form or over the phone, the form or our staff refers to this policy.

We might collect information from third parties including employers, municipal councils, Centrelink, Job Services Australia providers, Australian Apprenticeships Centres, Industry Skills Councils, Training and Skills Commission, Traineeship and Apprenticeship Services, other Government agencies, direct marketing database providers, public sources and, if the case arises, from a parent or guardian for those students under the age of 18. We will not collect any additional personal information other than for the purpose of ensuring we can deliver our services to you and information will only be collected in a fair and lawful manner.

If we collect information from third parties and the individual is not aware of the collection, we inform the individual that information has been collected from the third party.

### 4.2 Quality, security and retention

We take all reasonable steps to ensure that the personal information we collect is accurate, up to date and complete. We encourage you to advise us on any change to your personal information.

We hold personal information both in electronic and paper format. Paper files are archived in boxes and stored in-site. We have security access to our premises and control and protection measures regarding our electronic databases, such as usernames and passwords. This is to ensure that the information is disclosed only to the intended person.

We retain personal information for as long as we are required to do so to conduct business activities in line with the relevant legislation. Civil Train SA is required by law to retain records of learners' qualifications and statements of attainment issued for a period of 30 years. These will be archived 12 months after completion of the accredited course or qualification.

If Civil Train ceases operation as an RTO learners' personal information will be transferred to the Australian Skills Quality Authority (ASQA).

In the event that a new owner takes over Civil Train SA:

- The new owner will be required to meet the VQF registration standards including those meeting Privacy and Records Management;
- Civil Train SA will place a notice in the Advertiser (or its equivalent at the time);
- The new owner will take responsibility for the archiving and access of those records.

As soon as your personal information or components of it are no longer required, and it is lawful to do so, we will take all reasonable steps to destroy and/or de-identify the information. If we receive personal information indirectly (unsolicited) from a party other than yourself, we will make a determination on whether the information needs to be retained in order to provide our services to you as previously explained, or whether the information can lawfully be destroyed or de-identified.

## **5. Use and disclosure of personal information to third parties**

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### **5.1 Purpose**

We use and disclose personal information for the purposes for which we collect that personal information, any directly related purpose or for purposes which are related to one of our functions or activities. We will first obtain your consent where we wish to use the information for an unrelated purpose.

The purposes for which information is collected include: statistical and reporting purposes, assessing learners' eligibility for training and needs, administering enrolments, delivering education, training and assessing students, issuing qualifications, assisting learners to obtain training and/or employment, assisting employers to claim lawful incentives, monitoring and auditing our services, etc.

We will not disclose your personal information in other circumstances unless one of the following applies:

- you have consented to the disclosure;
- you would reasonably expect, or
- have been told, that your information is passed to those individuals, bodies or agencies; or
- it is otherwise required or authorised by law.

### **5.2 Disclosure**

For the purpose of providing our services, we might disclose personal information to the following third parties:

- financial institutions for payment processing
- employers (to confirm learners training status and provide course results where the employer subsidises some or all of the individual's course fees)
- Government, state and regulatory bodies (such as the Department of State Development, ASQA and Centrelink)
- contracted service providers to enable them to provide some training services
- under age learner's parents

We do not transfer, store, process use or disclose personal information overseas.

### 5.3 Direct marketing

When you provide your personal details to us, you consent to us using your personal information for direct marketing purposes (for an indefinite period).

We may send you information about products and services offered by us. For direct marketing purposes we contact you by mail, telephone, email or SMS. Where we use or disclose your personal information for the purpose of direct marketing, we will:

- allow you to 'opt out' or in other words, allow you to request not to receive direct marketing communications; and
- comply with a request by you to 'opt-out' of receiving further communications within a reasonable timeframe.

We will only ever contact you if you have consented to direct marketing, and you can ask to be removed from our marketing lists at anytime by directly contacting us.

If you do not wish to be contacted please write to our Privacy Officer at [privacy@ccfsa.com.au](mailto:privacy@ccfsa.com.au).

## 6. Rights and Choices

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You can request access to the personal information we hold about you by contacting our Privacy Officer by email at [privacy@ccfsa.com.au](mailto:privacy@ccfsa.com.au). If we determine, having regard to the APPs, that it is either not lawful or not required by law to provide you access to the personal information we hold, we will provide you with a written response within a reasonable period of time, setting out our reasons. If we are otherwise obliged or permitted to give you access to that personal information, we will do so within a reasonable time. We reserve the right to charge you an in excess fee for giving access.

If personal information we hold about you is incorrect, we will, on your request to correct it or where we are satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading, take such steps as are reasonable in the circumstances to ensure that the information is corrected. However, if you request us to correct personal information that we hold about you and we refuse to do so, we will, to the extent reasonable, provide you a written response as to our reasons.

## 7. Complaints

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If you have a complaint about how we collect, hold, use or disclose your personal information or a privacy related issue such as refusal to provide access or correction, please contact our Privacy Officer at [privacy@ccfsa.com.au](mailto:privacy@ccfsa.com.au). The Privacy Officer will provide a response within 30 days of receiving your complaint. If you are unhappy with the response you can refer your complaint to the Office of the Australian Information Commissioner (OAIC) at <http://www.oaic.gov.au/privacy/privacy-complaints>.

For other complaints not related to privacy issues please refer to Civil Train SA Appeals and Complaints Policy published on our website.

## 8. Contact details

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For all other privacy related inquires, you can contact:

Privacy Officer

Civil Train SA

1 South Rd, Thebarton, SA 5031

Ph: 08 8111 8000

Email: [privacy@ccfsa.com.au](mailto:privacy@ccfsa.com.au)

## 9. Contact details

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We may amend this Privacy Policy from time to time.

We will notify you by republishing our Privacy Policy and posting it on our website.

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