1. **Context**

Torrens University Australia (the University) is committed to:

- protecting the privacy of individuals who interact with any aspect of its business, and
- handling personal information in accordance with relevant legislation and guidance including where applicable the Australian Privacy Principles and the General Data Protection Regulation (GDPR) set out in the Privacy Act 1988 (Cth).

In providing products and services, the University will be transparent about how and why information is collected and used. Where appropriate individuals will be provided with the opportunity to specify the ways information is collected or used.

2. **Definitions**

General Data Protection Regulation (GDPR): a European Commission regulation intended to strengthen data protection for individuals within the European Union and address the export of such data outside of the European Union.

Personal information: information or an opinion about an identified individual or an individual who is reasonably identifiable from the information or opinion. The information or opinion does not have to be true or recorded in a material form.

3. **Scope**

This Privacy Policy applies to the collection, storage, processing, use and disclosure of personal information by Torrens University Australia. It also sets out information about how the University may give access to personal information.

4. **Collection**

4.1 Prospective students, students and alumni

When showing interest, applying for or enrolling into a course of study, Torrens University Australia will collect personal information such as name, address, contact details, date of birth, citizenship, educational history and prior academic results, work history (if required as a basis of admission), emergency contact details, details of parents or guardians (for students under 18 years of age at the
time of enrolment) and credit card details. Additional information may be collected during a course of study and dealings with the University.

The University may collect other personal information which may identify racial or ethnic origins (including proficiency in languages other than English), information about health or disability (where this is relevant to accommodating specific needs) and membership of professional or industry associations (where required as a basis of admission or for credit transfer/recognition of prior learning).

The University may collect government related identifiers, such as a tax file number, passport number, Confirmation of Enrolment (COE) number, student concession number and Commonwealth Higher Education Student Support Number (CHESSN), which may be necessary to verify a person’s identity, to confirm eligibility for enrolment or to administer entitlement to financial assistance. The University may collect personal information because it is required to do so by laws that require the University to report to Commonwealth, State and Territory government agencies for planning, evaluative, administrative and funding purposes.

The University may collect personal information from other educational institutions where necessary to verify qualifications and course credits for enrolment and assessment purposes:
- from organisations where a work integrated learning placement, internship or practical component is completed as part of a Torrens University Australia course
- from an employer if a course of study is being supported or incorporated into employment
- from education agents
- from other educational institutions and organisations that work with the University to recruit students into courses of study
- from other educational institutions or organisations that work in partnership or affiliation with the University to provide, promote, accredit or recognise courses of study
- from third parties for the purpose of direct marketing of services (see 8).

Communications with the University may be monitored (including emails, telephone) for security and dispute resolution purposes, where it is lawful to do so.

4.2 Prospective employees, employees, contractors and staff
When making an enquiry about or applying for a position with Torrens University Australia, the following information may be collected: name, home address, educational and work history and contact details (including telephone, fax and personal email address).

Information may be collected from third parties such as referees. When providing contact details of referees, consent is being given to the University to collect personal information from the named referees.

When the University is proposing to offer an employment position, additional personal information may be collected, such as date of birth, tax file number, emergency contact details, ABN (if relevant), bank account, superannuation information, visa, passport and licence details (if relevant), qualification information, awards, publications, copies of transcripts and details relating to working
with children and police checks. For unsuccessful candidates, resumés may be maintained on file for future opportunities, only when a candidate has provided permission to do so.

During employment with the University other personal information may be collected, including records of work performance, medical certificates, nationality, membership of a professional or industry association, trade union membership, overseas health cover and information concerning any disputes relating to employment.

This Privacy Policy does not apply to employee records held by the University relating to an employee or former employee of the University.

4.3 Visitors to Torrens University Australia websites
Torrens University Australia uses cookies and measurement tools on its websites, as do third parties such as analytics, advertising or advertisement serving partners who may monitor unidentifiable statistics relating to website access and usage. The University uses and discloses the unidentifiable information collected through the use of cookies and measurement tools in accordance with this Privacy Policy. This includes using the information to report statistics, analyse trends, diagnose problems and improve the quality of the University’s products and services.

The University may combine our cookies and information (collected through the cookies and measurement tools) on University websites with other information (including information collected by third parties using their own cookies and measurement tools) to provide better or more relevant services and information.

If an individual does not want information collected through the use of cookies and/or measurement tools, they may be able to delete or reject cookies and/or some of the measurement software features through their browser or the settings section of their mobile or tablet device. Disabling these features may cause some of the functions on University websites to work less effectively.

The University provides links to external websites, as well as to third party websites that allow interaction and sharing of content including social media buttons such as Facebook share, Twitter, Pinterest and Google+. These linked sites, applications and widgets are not under the University’s control and the University does not accept responsibility for the conduct of companies linked to the University’s websites, or their collection of information through these third party applications or widgets. Before disclosing information on any other website, or using these applications or widgets users are advised to examine the terms and conditions of using that website and the relevant third party’s data collection practices and privacy policy.

The Internet is not always a secure method of transmitting information. While the University takes reasonable steps to ensure all information it receives is maintained securely, the University cannot ensure that communications conducted via the Internet will be secure.
5. Purpose of collecting and holding personal information
Torrens University Australia collects and holds personal information for the purpose of offering and providing educational products and services and requests information to manage and administer those products and services. When the University collects personal information about individuals who are not current students or the University graduates, the University generally does so for the purposes for which the information was provided. All appropriate personal information will be held by the University to satisfy record-keeping obligations.

The University also collects and holds personal information of prospective employees, staff members or contractors for the purpose of meeting the business needs of the University, or for a directly related purpose, including establishing, managing or terminating an employment relationship with the University, for audit and compliance purposes as well as emergency situations whereby personal information may be required for the safety of the staff member.

5.1 Anonymity
The University will provide individuals with the option of remaining anonymous or using a pseudonym in their dealings with the University where it is lawful and practicable (for example, when making an enquiry). Generally is it not practicable or lawful for the University to deal with individuals anonymously or pseudonymously on an ongoing basis (for example, if the individual wishes to enrol in a course of study).

5.2 Staff internet activity
For security purposes, staff members’ internet activities on Laureate-owned computers will be monitored and a filtering system will be used to block access to certain sites.

6. Security of Information
The University collects and holds personal information in paper-based and electronic records and systems. Personal information may be collected in paper-based documents and converted to electronic form for storage (with the paper-based document either being archived or securely destroyed).

The University uses physical security, password protection and other measures to ensure that all personal information is protected from misuse, interference and loss; and from unauthorised access, modification and disclosure.

7. Use and disclosure of personal information
The University uses and discloses personal information for the purposes disclosed at the time of collection, or otherwise as set out in this Policy. Personal information will not be used or disclosed for any other purposes, unless consent has been given or the University is authorised or required to do so by law.

Personal information will generally only be used or disclosed as follows:
- To provide the products, services or information requested from the University (including enrolment, assessment and issuing certificates of completion and testamurs).
Personal information may also be disclosed to third parties (where applicable) to assist the University with functions such as recruitment of students, work integrated learning placements or providing overseas student health cover

- To register and administer events, promotions or competitions
- To verify personal information details upon request from third parties, such as completion of courses, a request from a potential employer verifying a qualification and further enrolment into another institution
- To comply with the University’s legal and regulatory obligations, including disclosure and reporting to Commonwealth, State and Territory government agencies for planning, evaluative, administrative and funding purposes. This may include:
  - disclosure and reporting to Commonwealth and State government agencies (including State Training Authorities) for the purpose of administrating entitlements to financial assistance under Commonwealth and State government programs for supporting students, such as FEE-HELP and VET Student Loan
  - disclosure to government agencies responsible for administrating and regulating education and training providers in Australia, such as Tertiary Education Quality and Standards Agency (TEQSA), Australian Skills Quality Authority (ASQA), Tuition Protection Service (TPS),
  - tuition assurance scheme providers, and
  - disclosure to government agencies with responsibility for administering immigration and student visa arrangements (including disclosure of suspected breaches of student visa conditions).
- For students under 18, information regarding attendance, progress and general well-being may be provided in order to keep parent(s) and/or guardian(s) adequately informed
- To assist the University to make its sites, service and products more accessible and valuable to students
- To perform various administrative or management functions including administrating billing and debt recovery; training of staff and contractors and managing their work performance and career progression, quality assurance and evaluation; maintenance and testing of information technology systems; obtaining advice from consultants and professional advisers; management of legal liabilities and claims (including liaising with legal representatives and insurers).
- To the extent that the University is required to report data breaches to the Office of the Australian Information Commissioner. These breaches occur:
  - when there is unauthorised access, disclosure or loss of personal information
  - when the breach is likely to result in serious harm (to one or more affected individuals), and
  - when preventing the risk of serious harm through remedial action is unsuccessful.

8. Marketing
Torrens University Australia uses and discloses the personal information it collects for marketing purposes. Marketing may include providing individuals with information regarding products, services, events and new developments, as well as collecting marketing feedback (e.g., marketing surveys). To meet the mandatory consent requirement under the Spam Act 2003, the University provides a facility for individuals to reflect consent to receive University marketing communications. Also, individuals may request not to receive direct marketing communications or opt-out through either of the following means:
- by contacting the University (see section 11), or
• by clicking the ‘unsubscribe’ link at the bottom of any email communications received from the University.

NOTE: Despite the above:

• The University will still contact individual prospective and/or current students in respect of:
  o ongoing business and operational matters, for example: invoices, student and graduate surveys, and information relevant to their course of study.
  o transactional and responsive emails, which include requests made through ‘contact us’ and ‘enquiry forms’ on the University websites.
• Requesting not to receive marketing communications and opting out will not unsubscribe individuals from receiving other University communications for which they provided their personal information for other purposes separately.

9. Disclosure of information to overseas recipients
As a member of the Laureate International Universities network, the University may from time to time disclose personal information within the network to overseas recipients. Such recipients may be located in the United States of America or other locations.

The University may also disclose personal information to other educational institutions to facilitate international study or for recognition of prior learning.

10. Access and Correction of Personal Information
For current and former students, simple enquiries regarding personal information (such as confirming current contact details or confirming results) must be sent to the Campus Life team. For current and former staff, email People & Culture.

To request access to other personal information, please contact Torrens University Australia’s designated Privacy Officers at payroll@laureate.net.au for staff and privacy@torrens.edu.au for students and other individuals. In limited circumstances, access to personal information may be declined in accordance with the Australian Privacy Principles.

The University endeavours to keep all personal information accurate, up-to-date and complete; however, if information held by the University is considered to be inaccurate, out-of-date, incomplete, irrelevant or misleading, a request can be made for a correction of the information. Staff, students or other individuals may also request that their personal information be deleted in certain circumstances. Where applicable and to the extent compatible with the University’s obligations at law, the University will act according to such individual’s instructions about the timing of deletion or destruction of such personal information to comply with the GDPR storage limitation principle. Contact the University’s designated Privacy Officers at payroll@laureate.net.au for staff and privacy@torrens.edu.au for students and other individuals. After receiving such a request, the University will take reasonable steps to correct and/or delete the information.

The University may, however, refuse a request to access, correct or delete personal information in certain circumstances as provided by legislative and regulatory requirements. In such instances, the University will provide a reason for the decision.
11. Enquiries
All privacy enquiries should be directed in writing to the Privacy Officer using the Request for Access to Personal Information form. Torrens University Australia will respond to a request for access to personal information within 30 calendar days.

An individual has the right to withdraw their consent for the University's use and disclosure of their personal information at any time by formally requesting this in writing to the Privacy Officer. Such withdrawal of consent shall not affect the lawfulness of processing based on consent given before the withdrawal. Consequences of withdrawing consent or requesting deletion or destruction of personal information may include but are not limited to:

- inability to process payment of a staff member’s wages
- failure to assess or process a prospective student’s application to a [Provider] course or receive updates and offers
- cancellation of their enrolment of a student or their ineligibility to graduate
- failure to receive alumni updates and offers.

The contact details for the University’s Privacy Officers are:
Privacy Officer
Torrens University Australia
Level 24, World Square Building
680 George Street
Sydney, NSW 2000
www.torrens.edu.au
privacy@torrens.edu.au (students and other individuals)
payroll@laureate.net.au (staff)

12. Complaints
Students may lodge a complaint under the Student Complaints Policy for actions undertaken under the Privacy Policy and related procedures while staff may do so under the relevant grievance policy.

If Torrens University Australia’s response to a complaint is unsatisfactory or it is believed that the University may have breached the Australian Privacy Principles or the Privacy Act, a complaint can be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992. Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.

13. References
General Data Protection Regulation
Privacy Act 1988 (Cth)
Spam Act 2003 (Cth)