

## PRIVACY POLICY AND COLLECTION NOTICE

LAST REVISED: 1 DECEMBER 2018

### 1. OVERVIEW AND NOTICE

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- (a) Industry Training Australia Pty Ltd trading as Integrated Information Service (**us/we/our**) is contracted to the Commonwealth Government to provide the Australian Apprenticeships and Traineeships Information Service (**Services**) to various Australian Apprenticeships Support Network providers; training organisations and related service providers; government; employers; potential jobseekers and the public.
- (b) This Policy covers the provision of our Services to you (**you/your**) through our website, <https://www.aapathways.com.au> (**Website**), app known as “AusAppPathways” (**App**), and any other interactions you have with us.
- (c) We are committed to protecting your privacy. We will handle personal information that we collect or obtain in connection with the provision of our Services in accordance with this Privacy Policy and Collection Notice (**Policy**) and the Privacy Act 1988 (Cth) (**Privacy Act**). Personal information is information that can be used to reasonably identify an individual.
- (d) This Policy contains information:
  - (i) about how you may access your personal information held by us,
  - (ii) how to seek the correction of your personal Information,
  - (iii) how to make complaints about any breach of the Australian Privacy Principles (**APPs**); and provides you with notice of the collection of your personal information by us.
- (e) Any changes to this policy will be displayed on our website at <https://www.aapathways.com.au>. If you object to any changes, you may discontinue your use of our Services.
- (f) Subject to clause 1(g), by using our Services or otherwise supplying us your personal information, you warrant that you are either 15 years or over and consent to our collection, use, disclosure, storage, destruction and otherwise handling of personal information, in accordance with the terms of this Privacy Policy and the Australian Privacy Principles.
- (g) If you are less than 15 years old and wish to use our Services, you must get your parent or guardian to consent on your behalf. If you are a parent or guardian of such a user, you consent to our collection, use, disclosure, storage, destruction and otherwise handling of your child’s personal information, in accordance with the terms of this Privacy Policy and the Australian Privacy Principles.
- (h) If you provide a pseudonym to or wish to remain anonymous, you can browse and view the Website and the App without restrictions. However, we may not be able to provide you with the full extent of our Services (e.g. provide information that is specific to you) without accurate contact details. We require service providers to provide accurate contact details.

### 2. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

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- (a) We collect personal information through the following avenues:

- (i) when you complete a form or registration process in relation to our Services on the Website, App or otherwise, including but not limited to when you when you subscribe to our newsletter, or request for our Career Interest Explorer results to be emailed to you;
- (ii) when you (or where you are a minor, your guardian/parent on your behalf) provide express written consent for us to make videos and/or audio recordings of you for educational, informational and promotional purposes relating to our Services;
- (iii) where you have inquired or otherwise communicated with us in person, over email or phone, or otherwise;
- (iv) in such other situations, which we will inform you of from time to time, where we collected personal information from you that was reasonably necessary for the proper function of our Services; and
- (v) if you are an employee of a service provider listed on our website, the following also apply:
  - (A) when you attend our on-site training programs;
  - (B) where your employer provides us with your personal information for the purposes of allowing other users to contact a representative of your employer; and
  - (C) from time to time, when third parties such as Eventbrite, provide us with your personal information at your request, for example when you make a booking to attend our training programs.

### **3. WHAT PERSONAL INFORMATION DO WE COLLECT?**

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- (a) The kind of personal information we may collect from you will depend on your relationship with us and the nature of your interaction with us.
- (b) We will not sell or trade your personal information to any third party, organisations or individuals without your consent.
- (c) We usually collect, use and store the following types of personal information:
  - (i) names, email addresses, qualifications, employment details, phone numbers, geographical information, and other personal information that you may voluntarily provide to us to assist us to conduct our business and provide our Services; and
  - (ii) information about your organisation's staff and directors as required in the normal course of human resource management and business operations.

### **4. WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?**

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- (a) Because of the nature of the Services we provide, where you are providing contact details of a representative of your organisation, you must provide accurate personal information of your representative as it is impracticable for us to provide Services otherwise.
- (b) We may use and disclose your personal information for the following purposes:
  - (i) providing our Services, including the course of regular operation of the Website, App and/or the Services;

- (ii) to provide you with further information about products and Services you requested;
  - (iii) to personalise your experience of our Services;
  - (iv) to respond to feedback and complaints;
  - (v) for the development of new Services or products;
  - (vi) for enforcement of our Terms of Use: <http://www.aapathways.com.au/terms-and-conditions>;
  - (vii) for direct marketing purposes, with your consent (see section 7 below);
  - (viii) to notify you of important changes to our site or content that may be of interest to you.
  - (ix) to understand customer trends and patterns so we can continue to develop our marketing and advertising strategies; and
  - (x) for any other purpose for which you give your consent.
- (c) We may disclose your personal information:
- (i) to third parties assist us to provide you with the relevant Services, including sub-contractors, our website hosting provider and technology service providers such as Luminary Digital Pty Ltd and Microsoft Corporation. We also refer you to section 5 below;
  - (ii) to the Commonwealth Government of Australia as we are a contracted service provider; and
  - (iii) to any duly authorised law enforcement officer or any other person authorised by any law, or in circumstances permitted by the Privacy Act.

## 5. DO WE DISCLOSE YOUR PERSONAL INFORMATION OVERSEAS?

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- (a) From time to time, we may record videos, with your consent, which may contain your personal information as part of providing our Service. By uploading the videos to our Youtube Channel located at: <http://www.youtube.com/user/AAPathways>, or our other social media platforms, such as Facebook or Twitter (**Social Media Platforms**), we may be disclosing your personal information to the Social Media Platform.
- (b) The Privacy Act and corresponding APP 8.1 requires us to ensure that, before disclosing personal information overseas, reasonable steps are taken to ensure that overseas recipients do not breach the Act or the all applicable APPs. It is not always possible for us to do so for Social Media Platforms which operate globally. APP 8.1 will not apply to such disclosure to these overseas Social Media Platforms, where you have given your consent through a media release.

## 6. ARE WE RESPONSIBLE FOR THIRD PARTIES WEBSITES AND SOCIAL MEDIA LINKS?

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This Policy applies solely to personal information collected with regard to our Website, App and/or our Services. We are not responsible for the collection of information and/or privacy practices of any other third party events service providers such as Eventbrite, websites that may be linked to from the Website from time-to-time, or social media (e.g. Facebook, Twitter, YouTube) accessed via links on our Website or App. We refer you to the privacy policies and terms of use of those relevant service providers.

## **7. DO YOU NEED TO KNOW MORE ABOUT DIRECT MARKETING?**

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- (a) Your personal information may be used to offer you new products and services, notify you of new developments to our existing Services, or any other promotional communication related to our Services.
- (b) If you do not wish to receive direct marketing communications from us, you may opt-out any time by clicking a link on the email communications sent to you or contacting us as set out in section 11.

## **8. DO YOU NEED TO KNOW MORE ABOUT COOKIES?**

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- (a) During your visit to our Website or App we may collect information about your computer, page visits and internet connections using cookies.
- (b) We use Google Analytics as part of our information gathering (see [www.google.com/analytics/](http://www.google.com/analytics/) for details). This enables the collection of data about traffic via a DoubleClick cookie in addition to data collected through Google Analytics, and the analysis and improvement of our Website and related Services. The data available to us is aggregate only and does not identify you personally.
- (c) We will not facilitate the merging of personally-identifiable information with non-personally identifiable information previously collected from Display Advertising features that is based on the DoubleClick cookie.
- (d) Using Ads Settings, visitors to our website and app can opt-out of Google Analytics for Display Advertising and customise Google Display Network ads. A browser opt-out is available at: <https://tools.google.com/dlpage/gaoptout/>.

## **9. HOW DO WE KEEP PERSONAL INFORMATION SECURE?**

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- (a) You should be aware that there are inherent risks associated with the transmission of information via the Internet. Data security measures can never be guaranteed. This means that while we take all commercially reasonable steps to protect your personal information, we cannot guarantee its security.
- (b) If you suspect any misuse or loss or unauthorised access, modification or disclosure of your personal information, please contact us immediately.

## **10. WILL WE TRANSFER YOUR PERSONAL INFORMATION?**

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If there is a sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of us then, in our sole discretion but subject to our contract to the Commonwealth Government, we may transfer, sell or assign your personal information collected to one or more relevant third parties .

## **11. WHAT IF YOU HAVE QUESTIONS OR COMPLAINTS?**

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- (a) If you:
  - (i) have any questions about this Policy;
  - (ii) wish to request access to any personal information;

- (iii) wish to correct or update your personal information. If you have an account, please attempt to do so through the account first;
- (iv) wish to be de-identified, or have your personal information deleted; or
- (v) wish to make a complaint or discuss any other privacy concerns you may have

please contact us at:

The Privacy Officer  
by email: [privacy@aatis.com.au](mailto:privacy@aatis.com.au)  
by telephone: (03) 9629 2488  
by post: Level 3, 10 Queen Street, Melbourne VIC 3000

- (b) If you believe we have breached our obligations under this Policy or the Australian Privacy Principles, please give us the opportunity to resolve matters by contact us first, in writing by email or by post. Once we have received a complaint, we will try to work with you to resolve the matter. The steps we may take to resolve the matter include:
  - (i) We may request further information from you. This will enable us to investigate the complaint and determine an appropriate solution.
  - (ii) We will discuss options for resolution with you. If you have suggestions about this this matter, please raise these with our Privacy Officer.
  - (iii) Where necessary, we will conduct an investigation and endeavour to do so within a reasonable time. we may have to conduct others in order to progress the investigation.
- (c) If you are not satisfied with our response to your complaint, you may wish to contact the Office of Australian Information Commissioner (**OAIC**). For more information, please see their website <https://www.oaic.gov.au/about-us/contact-us>. Please note that the OAIC may decline to investigate until you have first raised the matter with us.