



## 1 WE RESPECT YOUR PRIVACY

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Affinity Education Group Limited (collectively “Affinity Education”, “we”, “us” or “our”) respects your right to privacy and to protecting the privacy of your personal information. This Privacy Policy sets out how we collect and treat your personal information, including personal information collected through our websites.

We are committed to ensuring that all personal information is only collected, disclosed, used and stored in accordance with the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles (“Privacy Legislation”).

This Privacy Policy applies to our guests, visitors to [www.affinityeducation.com.au](http://www.affinityeducation.com.au) (“website”), subscribers to any of our services, purchasers of our services and products and any individual who interacts with us.

Your use of the website is also subject to the Affinity Website Terms of Use.

## 2 COLLECTION OF INFORMATION

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### 2.1 What information do we collect?

We collect personal information where it is reasonably necessary for the purposes of identifying you, establishing your requirements and providing our products or services and to carry out our functions or activities.

We may collect personal information about you, including (but may not be limited to) your name, gender, address, phone number, facsimile number, email address, bank account or credit card details, place and type of business, Internet Protocol (IP) address and information relating to your dealings with Affinity Education and our clients.

We may also collect sensitive information about you (which includes such information as your health, racial, or ethnic background). Sensitive information will only be collected with your consent, except where we are required or permitted by lawful authority to collect sensitive information without consent.

If you do not wish to provide your personal information, or you provide inaccurate information, it may impact on the services that we are able to provide to you.

You may provide us with personal information on behalf of someone else, if it is unreasonable or impracticable to collect that information directly from that individual.

### 2.2 How do we collect information?

We collect personal information from you in a variety of ways, including for example:

- when you interact with us electronically or in person;
- when you access our website;
- by application for products or services;
- applying for a position of employment with us; and
- contacting or corresponding with us, for example to ask for information.

### **2.3 Unsolicited personal information**

If we receive unsolicited information we will decide if that information is reasonably necessary for our functions or activities. If we decide the information is reasonably necessary, we will handle this information the same way as other personal information set out in this Privacy Policy, otherwise we will handle any unsolicited information in accordance with the law, including destroying or de-identifying such information where we are permitted to do so.

## **3 REMAINING ANONYMOUS OR USING A PSEUDONYM**

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You have the option to remain anonymous or use a pseudonym (a name other than your own) when interacting with us. We will try to provide you with this option wherever we can. However, you won't be able to be anonymous or use a pseudonym where it would be impracticable for us to provide you with our services or carry out our functions or activities, or if required by law.

## **4 HOW DO WE USE AND DISCLOSE YOUR PERSONAL INFORMATION**

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We use or disclose your personal information for the primary purpose for which it was collected. We may also use and disclose your personal information for a secondary purpose where you would reasonably expect us to use or disclose your personal information for that secondary purpose, or where you have provided your express or implied consent.

For example, we may use your personal information to provide products or services to you, improve our services, and conduct product development and training.

We may need to share your information with our related entities and other third parties, including service providers who assist us in the provision of conducting our business, including for example:

- insurance brokers;
- banks;
- legal providers;
- data storage services;
- email filtering;
- virus scanning and other technology services providers;
- government departments or authorities; and
- where required by law.

## **5      MARKETING**

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We may also use and disclose your personal information to notify you of opportunities, invitations to seminars or events, and products and services that we think you might be interested in where you have either provided your consent or you have a reasonable expectation that your personal information will be used for this purpose. We may conduct these marketing activities via mail, email, telephone, SMS, social media, or any other electronic means. We will always provide an opt-out option for you so you can stop receiving our marketing material.

You can also let us know at any time if you no longer wish to receive direct marketing material from us by sending an email to [reception@affinityeducation.com.au](mailto:reception@affinityeducation.com.au). We will process your request as soon as practicable.

## **6      HOW WE STORE AND SECURE YOUR PERSONAL INFORMATION**

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We are committed to respecting your privacy at all times, and will take reasonable precautions to ensure your personal information is stored securely.

Your personal information may be stored in hard copy paper or electronic files on our secure IT systems and databases. We may also store information on cloud based servers located in Australia. Affinity will take reasonable steps to keep your personal information we hold secure from misuse, interference and loss, unauthorised access or modification.

However, except to the extent liability cannot be excluded due to the operation of statute, Affinity excludes all liability (including in negligence) for the consequences of any unauthorised access to your personal information. Please notify us immediately if you become aware of any breach of security.

If we determine that we no longer need information about you, or we are no longer required by law to hold it, we will destroy that information or ensure that it is de-identified.

## **7      WEBSITE**

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### **7.1    When you visit our websites**

When you come on to our website we may collect certain information such as browser type, operating system and website visited immediately before coming to our site. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

### **7.2    Cookies**

As is very common for companies, we use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. We use cookies to improve the experience of people using our website.

### 7.3 Third party sites

Our site has links to other websites not owned or controlled by us. We are not responsible for these sites or their privacy practices.

## 8 DISCLOSURE OF YOUR PERSONAL INFORMATION OVERSEAS

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We will not disclose your personal information to recipients outside Australia.

## 9 ACCESS TO YOUR PERSONAL INFORMATION

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You can access and update your personal information by contacting us at [reception@affinityeducation.com.au](mailto:reception@affinityeducation.com.au). We will process all requests for access to personal information in accordance with the Privacy Legislation. In most cases we will provide you with access to your personal information within 30 days. However, in certain situations as listed in the Privacy Legislation we may refuse access. If we refuse to give you access to your personal information, we will provide you with reasons for our refusal. We may charge a reasonable administration fee for processing your request.

If any personal information we hold about you is not accurate, up to date or complete, please let us know.

The access and correction requirements of the Privacy Legislation operate alongside and do not replace other informal or legal procedures including the *Freedom of Information Act* (1982).

## 10 COMPLAINTS ABOUT PRIVACY

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If you have any complaints about how we use, disclose or collect your personal information or our privacy practices, you may make a complaint to us by:

1. calling us on 07 5528 0633; or
2. writing to us at:

The Privacy Officer  
PO Box 624  
Biggera Waters QLD 4216

1. email us at:

[reception@affinityeducation.com.au](mailto:reception@affinityeducation.com.au)

We take complaints very seriously and will investigate and respond as soon as we can after receiving written notice of your complaint.

For more information, you can visit the Federal Privacy Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au).

## **11 COMMENT**

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Any feedback or comments on this policy, including its effectiveness, should be sent to [reception@affinityeducation.com.au](mailto:reception@affinityeducation.com.au). Comments will be reviewed, and if applicable, responded to by the Privacy Officer.

## **12 CHANGES**

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Please be aware that we may change this Privacy Policy in the future. The revised versions will be uploaded onto our website, so please check back from time to time.

This Privacy Policy was adopted on 12 March 2014