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## Privacy Policy

### Our privacy commitment

Protecting your privacy is important to us. We comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles set out in the Privacy Act when handling Personal Information.

This Privacy Policy explains how St Catherine's College Inc. (ABN 33 871 420 832) (the **College**) treats the Personal Information provided to us by or on behalf of you. This Privacy Policy also explains the types of Personal Information that we collect and use for the purpose of processing and recording any enquiry you submit to us through our website, contact you and provide you with information in relation to your enquiry. It also provides details about your privacy rights (including how you may contact us if you have any concerns, complaints or questions about the handling of your Personal Information) and our general rights and obligations.

### Key terms used in this Privacy Policy

In this Privacy Policy the expressions "**we**", "**us**" and "**our**" refer to the College. The expressions "**you**" and "**your**" refer to each individual whose Personal Information we may handle from time to time where we are required to comply with the Privacy Act in respect of such Personal Information. "**Privacy Policy**" means this document as amended from time to time.

### What is Personal Information?

**Personal Information** means any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

Some Personal Information may include Sensitive Information.

**Sensitive Information** has the meaning as set out in the Privacy Act and includes health information.

The type of Personal Information we collect includes, but is not limited to, the following kinds of information:

- (a) name;
- (b) date of birth;
- (c) contact details (such as email, address, phone numbers);
- (d) gender;
- (e) next of kin details;
- (f) health information i.e. medical conditions;

- (g) Bank account and credit or debit card details;
- (h) Details of required primary identification information i.e. drivers licence
- (i) Visa Information; and
- (j) Enrolment information.

### **Whose Personal Information do we collect?**

We collect Personal Information from people who are connected to our operations and activities – including residents, potential employees, donors, suppliers and volunteers.

### **How do we collect your Personal Information?**

We collect Personal Information when you contact us, stay with us, use our facilities, make a donation or apply for an employment opportunity with us.

Our preference is to collect Personal Information about an individual directly from that individual unless it is unreasonable or impracticable for us to do so. Information will generally be collected from the following sources:

- (a) registration or subscription process;
- (b) from CCTV cameras on College owned or operated property;
- (c) from public health databases where the relevant consent processes described in the national research and ethics codes are reviewed and approved;
- (d) from individual's usage of the Colleges internet services;
- (e) from third parties with which the College collaborates; and
- (f) Forms that are submitted by individuals (including via online portals).

### **What happens if you don't provide all this information?**

The Personal Information you provide to us is provided on a voluntary basis. If you do not provide some or all of the Personal Information requested, we may not be able to offer you all of our services, for example, providing you with accommodation or use of our facilities.

### **Why do we collect your Personal Information?**

The College will only collect and use an individual's Personal Information or Sensitive Information for the purpose for which it was collected (the primary purpose);

for a secondary purpose that is related to the primary purpose (if the information is sensitive information, it will only be used or disclosed for a secondary purpose which is directly related to the primary purpose) and that the individual would reasonably expect his or her information to be used or disclosed for this secondary purpose;

with the individual's consent; or as otherwise allowed, required or authorised by law.

Generally, to the extent permitted by applicable law, we only use and disclose your Personal Information for where the information is reasonably necessary for the performance of one or more functions and/or activities as a provider of accommodation, education and as an employer.

The College will collect and use personal information by lawful, fair and transparent means, and where possible, directly from the individual.

The College will collect Personal Information that is adequate, relevant and limited to what is required for College purposes.

The purposes for which we will use your Personal Information include (without limitation):

- marketing: communicating with you about our operations and objectives and providing information to you about our activities, campaigns and events which we think you may be interested in (unless you have told us you do not want to receive such communications);
- donation purposes: sending you tax deductible receipts, newsletters, invitations and other College related information;
- volunteering and other support: enabling you to assist us with volunteering, community fundraising, advocacy and other activities where we seek the community's assistance;
- recruitment: assisting us with engaging with you when you apply for a position with us;
- verifying your identity; and
- complying with relevant laws.

### To whom do we disclose your Personal Information?

Subject to the paragraph below, we do not share your information with any third parties unless we have your specific consent to do so and we do not sell or share mailing lists.

To the extent permitted by the Privacy Act and other applicable privacy laws, we may:

- share your Personal Information with third parties (including our subcontractors) providing services to us in relation to our activities and operations;
- disclose your Personal Information on a confidential basis to third parties for the purposes verifying your identity or as may be required by law; and/or
- share your Personal Information with any third party to whom we assign or novate any of our rights or obligations or to any person that may acquire our business.

### Website usage information and cookies

When you browse the College's website, you do so anonymously. We typically log your IP address (the Internet address of your computer) to give us an idea of which parts of our website you visit and how long you spend there. However, we do not link your IP address to anything personally identifiable. The only other information automatically provided to us is the type of computer and operating system you are using. Your browser supplies us with this information.

Like many other websites, the College website may use a standard technology called a 'cookie' to collect information about how you use the site. 'Cookies' cannot be used to personally identify you.

### Communication from us - opting out of direct marketing communications

We do not use Sensitive Information for marketing purposes.

We may use your Personal Information provided by you (other than Sensitive Information) to supply you with information about our activities, campaigns and events.

Where we use your Personal Information to send you marketing and promotional information by post, email or telephone, we will provide you with an opportunity to opt-out of receiving such information. We will always ensure that our opt-out notices are clear, conspicuous and easy to take up.

If at any time you no longer wish to receive any direct marketing communications from us or do not want your information disclosed for direct marketing, please contact our Marketing Team at [marketing@stcatherines.uwa.edu.au](mailto:marketing@stcatherines.uwa.edu.au)

Please note that even if you have requested not to receive further direct marketing communications, we may nevertheless continue to provide you with information about changes to our terms and conditions relating to our research and donation programs and other factual information as permitted under the Privacy Act and the *Spam Act 2003* (Cth).

### **Where is your Personal Information stored?**

Both us and our third party service providers, including providers of cloud services and website hosts, to whom we disclose your Personal Information may hold electronic records of your Personal Information using cloud technology or by other electronic means. These means of holding Personal Information may include transferring and storing the information outside of Australia. In these cases, such disclosure will only be for the purposes of providing services to the College and limited to only such Personal Information that is necessary to provide such services on behalf of the College. Providers will only act as authorised by the College and only in direct relation to the primary purpose the Personal Information was collected.

In this case, the College will take reasonable steps to ensure it has a contract that requires that the third party complies with the Australian Privacy Principles.

### **Data security**

We will take such steps as are reasonable in the circumstances to protect the Personal Information we hold from misuse or loss and from unauthorised access, modification or disclosure including ensuring electronic data is stored securely and password protected.

We will also take steps as are reasonable in the circumstances to destroy or de-identify Personal Information once we no longer need it for any purpose for which the information may be used, disclosed or retained under the Privacy Act.

However, when using our website, you should be aware that no data transmission over the Internet can be guaranteed as totally secure. Although we strive to protect such information, we do not warrant the security of any information that you provide us over the Internet and you do so at your own risk.

### **Changes to our Privacy Policy**

We may change or update parts of this Privacy Policy in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating this Privacy Policy on [www.stcatherines.uwa.edu.au](http://www.stcatherines.uwa.edu.au) You may obtain a copy of our current Privacy Policy from our website or by contacting us via the details provided above.

You may not be directly notified of such a change so please ensure that you regularly check this Privacy Policy so you are fully aware of any changes or updates.

### **Access to your Personal Information**

We will, upon your request, and subject to applicable privacy laws, provide you with access to your Personal Information that is held by us. However, we request that you identify, as clearly as possible, the type(s) of information requested. We will deal with your request to provide access to your Personal Information within 30 days. Your rights to access Personal Information are not absolute and privacy laws dictate that we are not required to grant access in certain circumstances.

If we refuse to grant you access to your Personal Information, we will provide you with reasons for that decision (within 30 days) and the avenues available for you to complain about the refusal.

Due to the potentially sensitive nature of some of the information we hold, we require photo identification of the applicant. Any applicant requesting information other than their own must also provide proof of their relationship to this person.

### Updating your Personal Information

We will take such steps as are reasonable in the circumstances to ensure that the Personal Information which we collect remains accurate, up to date and complete.

We will provide you with access to your Personal Information held by us unless we are permitted under the Privacy Act to refuse to provide you with such access. Please contact us at St Catherine's College, Crawley, WA, 6009 or call us on 08 9442 0400 or email [reception@stcatherines.uwa.edu.au](mailto:reception@stcatherines.uwa.edu.au), if you:

- (a) wish to have access to the Personal Information which we hold about you;
- (b) consider that the Personal Information which we hold about you is not accurate, complete or up to date; or
- (c) require further information about our Personal Information handling practices.

There is no charge for requesting access to your Personal Information but we may require you to meet our reasonable costs in actually providing you with access.

### Complaints

If you have a complaint or inquiry about the way in which we have handled any privacy issue, please contact us using the details below. We will use reasonable efforts to deal promptly with complaints and inquiries and, in any event, acknowledge your complaint within 30 days.

Chief Financial Officer, St Catherine's College  
2 Park Road, Crawley, WA, 6872  
Telephone: (08) 9442 0400  
Email: [reception@stcatherines.uwa.edu.au](mailto:reception@stcatherines.uwa.edu.au)

If you are not satisfied with how we manage your complaint, you may contact the Office of the Australian Information Commissioner.

Last updated: 10 November 2021