



**PRIVACY POLICY**

---

<b>1</b>	<b>INTRODUCTION .....</b>	<b>2</b>
1.1	Privacy - Legal requirements.....	2
1.2	Purpose .....	2
<b>2</b>	<b>INFORMATION RELATING TO YOUR PRIVACY .....</b>	<b>2</b>
2.1	Personal Information.....	2
2.2	The collection and holding of personal information.....	3
2.3	Purpose of collecting, using, storing and disclosing personal information .....	3
2.4	Requesting access and seeking correction of personal information.....	4
2.5	Making a complaint about the Kingsway’s handling of personal information .....	4
2.6	Is Kingsway likely to disclose personal information to overseas recipients.....	5
2.7	Security and use of Kingsway Website .....	5
<b>3</b>	<b>RELEVANT LINKS .....</b>	<b>6</b>

## 1 INTRODUCTION

---

### 1.1 Privacy - Legal requirements

Kingsway Institute is committed to protecting the privacy of your personal information. Kingsway Institute is required to comply with a number of privacy laws including the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (Privacy Act). The APPs regulate the manner in which personal information is handled by Kingsway Institute.

Access to the APPS can be found at <http://www.oaic.gov.au/privacy/privacy-act>.

### 1.2 Purpose

As a provider of ELICOS courses, related services and an employer, Kingsway Institute is required to collect, use and disclose personal information. Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual.

The purpose of this Policy is to provide information on the following:

- The kinds of personal information collected and held by Kingsway Institute;
- The way in which personal information is collected and held;
- The purposes for which personal information is collected, held, used and disclosed;
- How an individual may access their personal information and request any correction in the information;
- How an individual may make a complaint relating to the handling of personal information or a potential breach of the APPs and the process that will be adopted in handling a complaint;
- Whether Kingsway Institute is likely to disclose personal information to overseas recipients and if so, the countries where the recipients are likely to be located.

## 2 INFORMATION RELATING TO YOUR PRIVACY

---

### 2.1 Personal Information

Personal information collected by Kingsway Institute will depend on an individual's dealing with Kingsway Institute.

If you are a student, personal information provided to Kingsway Institute will be information required by Kingsway Institute in order for Kingsway Institute to provide ELICOS courses and any related services.

Your personal information will only be used for the administrative or educational purposes of Kingsway Institute or in accordance with your specific consent. Personal information will include information to enable Kingsway Institute to identify you and communicate with you in a legitimate and lawful way. Kingsway Institute will also collect information relating to your educational background, qualifications, academic results, banking and payment details, and tax file numbers.

If you are an employee of Kingsway Institute or a contractor, Kingsway Institute Kingsway Institute may collect personal information relating to your identity, employment history and qualifications, business and any other information that may be legitimately requested to facilitate your employment.

Sensitive Information is a type of personal information which includes personal information relating to health information, racial or ethnic origin, criminal records, and religious affiliation and political opinion. Sensitive Information will only be collected when it is required by law (including collection on behalf of the Australian Government) or it is necessary for the Kingsway's administrative or educational purposes and we have obtained your consent.

## **2.2 The collection and holding of personal information**

In most cases Kingsway Institute collects personal information directly from individuals through verbal and written communication, enrolment and admission forms and other types of direct questionnaires and surveys. We also collect our own information in the form of student and employment records.

Information is also collected from third parties such as government departments, education providers, and other parties you have authorised to provide information.

When we collect personal information from individuals Kingsway Institute will make every effort to draw this collection and its use to your attention at the time the information is collected.

Kingsway Institute stores and holds personal information in a secure and restricted manner. Personal information is stored both electronically and in hard form. Personal information may be archived or destroyed once no longer needed in accordance with the APPs. In both cases access is restricted to only those individuals authorised by Kingsway Institute to access the information in order to carry out their responsibilities. Where personal information is stored by a third party data storage provider Kingsway Institute will ensure that the third party provider is bound by a contractual obligation of confidentiality and non-disclosure.

When you visit the Kingsway website log files are generated which will include your IP address. The website does not provide facilities for the secure transmission of information across the Internet and you need to be aware of the inherent risks in transmitting personal information across the Internet. More information about the Kingsway website's limited use of Cookies is outlined in paragraph 2.7 below.

## **2.3 Purpose of collecting, using, storing and disclosing personal information**

Personal information provided by you to Kingsway Institute will only be used by Kingsway Institute for the administrative or educational purposes of Kingsway Institute, or for another purpose for which you have specifically provided consent.

Examples of the administrative or educational purposes which Kingsway Institute will collect, use, store or disclose your personal information are to provide a means of:

- Establishing proof of identity
- Enabling communication, providing emergency details, including next of kin
- Facilitating student admission, enrolment, continuation of course and graduation

- Obtaining payment of course fees, and other Kingsway services.
- Obtaining information relating to Kingsway's quality and compliance issues
- Meeting any statutory legal obligation of the Australian Government relating to the administration of ELICOS education for domestic and overseas students.
- Any other purpose for which an individual has consented to.

Kingsway Institute may disclose your personal information to a third party where the disclosure is required to allow Kingsway Institute to operate and function in its capacity as a registered education provider and the purpose of the disclosure relates to the purposes set out above. For example personal information may be disclosed to the Australian Government, contracted service providers, education providers and staff, information technology providers. Where Kingsway Institute discloses personal information for the purposes outlined above Kingsway Institute will make every effort to ensure you are advised of this disclosure at the time we collect the personal information. Where personal information is disclosed for one of the purposes above Kingsway Institute will ensure that any disclosure to a third party is subject to the third party agreeing to use the personal information for the purpose disclosed and maintaining confidentiality.

Kingsway Institute will obtain specific consent to disclose personal information to marketing, communication and related third party agencies. Where an individual consents to the disclosure of personal information for marketing and communication purposes the individual will be provided with an ongoing opportunity to opt out of receiving any communications at any time.

In some cases Kingsway Institute may de-identify personal information for quality and statistical analysis. If we disclose this type of information we will do so in accordance with the APPS.

Kingsway Institute will not disclose staff personal information without the consent of the individual unless disclosure is permitted by law.

## **2.4 Requesting access and seeking correction of personal information**

Individuals have a right to request access to their personal information and to request its correction.

A request for access to an individual's personal information can only be made by the individual to whom the personal information relates and should be made in writing to the Kingsway Administration if the request relates to a student's personal information or to the Kingsway Legal Advisor (nominated by Kingsway Institute) if the request relates to a staff member or contractor. If the request is to seek a correction of personal information the individual seeking the correction must provide evidence to support the correction.

## **2.5 Making a complaint about Kingsway's handling of personal information**

If an individual wishes to make a complaint about Kingsway's handling of personal information he or she should contact the Kingsway Legal Advisor. The Legal Advisor will try to resolve the matter informally. However if the complaint cannot be resolved the individual will be required to:

- Formally lodge the complaint in writing to the Legal Advisor with any supporting documentation attached to the complaint.
- Kingsway Institute will deal with the complaint within 30 business days and advise the individual lodging the complaint of the outcome.

If the individual is unhappy with the outcome he or she may refer the complaint to the Office of the Australian Information Commissioner. Further information about the external dispute resolution can be found at [www.oaic.gov.au](http://www.oaic.gov.au).

## **2.6 Is Kingsway Institute likely to disclose personal information to overseas recipients?**

Kingsway Institute will use its best efforts to ensure that your personal information is not disclosed to third party overseas recipients without your express consent. Personal information collected by Kingsway from staff and students is stored locally and securely by Kingsway Institute.

## **2.7 Security and use of Kingsway Website**

Kingsway Institute holds personal information electronically and in hard copy form. Personal information held on electronic databases is protected by Kingsway. All financial transactions processed by Kingsway Institute and the use of payment details meet industry standards.

When accessing Kingsway's website, log files are created by the web server that show the IP address of the visitor, time, date and pages visited. The information generated in web logs may be used to generate statistics about access to the Kingsway Institute site. In limited areas (online areas where login is necessary) the website uses cookies an analytical service provided by Google. Cookies are text files placed on your computer, to help the website analyze how users use the site. This information will only be used for statistical purposes but will be transmitted to and stored by Google on servers in the United States. You may refuse to use cookies by selecting the appropriate settings on your browser however this may limit your ability to use the website. By using the website in those limited areas you consent to the processing of data about you by Google for the limited purpose above.

While Kingsway Institute has in place secure password protections for Kingsway's website there is always a possibility that any personal information disclosed online may not be fully protected. Individuals disclosing personal information online should ensure they take steps to be vigilant when using their Kingsway accounts and not disclose their passwords or login to third parties.

If you become aware of a security issue or have concerns about any information you may have disclosed on the website please contact Kingsway's IT Department as soon as possible.

### 3 RELEVANT LINKS

---

Legislation:

The Privacy Act 1988 (Cth)

Health Records and Information Privacy Act 2002 (NSW)

Privacy and Personal Information Protection Act 1998 (NSW)

Contacts:

[admin@kway.nsw.edu.au](mailto:admin@kway.nsw.edu.au)

[www.oaic.gov.au](http://www.oaic.gov.au)