

SJ9: Privacy Protection

1.0 Purpose

- 1.1 This policy describes how Think Academy of Business and Technology collects, manages, uses, discloses, protects, and disposes of personal information of staff, contractors and students.
- 1.2 TABT is committed to protecting the confidentiality and privacy of its staff, contractors and students and, as such, is intent on complying with the Privacy Act 1988 (Cth) and the subsequent Privacy Amendment (Enhancing Privacy Protection) Act 2012 (the Act) which came into effect on 12th March 2014.

2.0 Collection and use of personal information

- 2.1 TABT collects personal information, either directly or indirectly, that is reasonably necessary for, or directly related to its delivery of the services it offers. Some of the information collected may be regarded as 'sensitive' as defined by the Privacy Act.
- 2.2 Personal information collected by TABT that may be regarded as 'sensitive' under the Privacy Act includes:
 - 'Disability' and 'long-term impairment status' (health); and 'indigenous status', 'language spoken at home', 'proficiency in spoken English', 'country of birth' (implies ethnic/racial origin). This information is specified in the AVETMISS data elements and is collected for the national VET data collections, national VET surveys, and may be collected for VET-related research.
 - 'Dietary requirements' (health-related) are collected for event catering purposes only.
 - Biographical information, which may contain information on 'affiliations' and 'membership of a professional or trade association' are obtained from key note speakers for event marketing purposes.
 - 'Memberships of professional associations' and 'health and work injury information' is collected from TABT staff for HR management purposes.

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- 2.3 Contact information such as name, organisation, position, address, telephone, and email are collected for marketing, support services, mandatory reporting and for communicating with stakeholders as part of our day to day operation.
- 2.4 Names, addresses, phone numbers, emergency contact details, bank account details and other employment related information is collected from staff for the purpose of managing human resources. The management of staff personal information complies with this policy.

3.0 Disclosure of personal information

- 3.1 TABT does not disclose personal information other than for the purpose for which it was collected, or an individual has consented to a secondary purpose, or an individual would reasonably expect this (such as receiving communications about upcoming events), or if required by law.
- 3.2 TABT may share personal information with the Commonwealth government in accordance with Commonwealth contractual obligations. In these circumstances TABT will take reasonable steps to inform and seek consent from the individuals concerned and take all reasonable steps to ensure that the recipient handles the personal information according to the APPs.
- 3.3 TABT does not sell its mailing lists to third-parties for marketing purposes.
- 3.4 TABT does not disclose personal information to overseas recipients. While people around the world can access material published on our website, no statistical or research publications contain identifiable personal information.

4.0 Right to access and correct records

- 4.1 Individuals may, subject to the exceptions prescribed by the Australian Privacy Principles, request access to and correction of their personal information where this is collected directly from individuals by TABT.
- 4.2 TABT does not charge for giving access to or for correcting personal information. Requests for access to or correction of personal information should be made in accordance with the student access to records policy.

5.0 Security of personal information

- 5.1 TABT will take all reasonable steps to ensure that any personal information collected is relevant to the purpose for which it was collected, is accurate, up to date and complete.
- 5.2 TABT routinely updates the information held in its customer relationship management system. This includes confirming with students who are returning for a new enrolment if their personal contact details have changed.

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- 5.3 TABT will store securely all records containing personal information and take all reasonable security measures to protect, personal information collected from unauthorised access, misuse or disclosure.

6.0 Complaints and concerns

- 6.1 Complaints or concerns about TABT management of personal information should be directed in writing to TABT CEO. TABT will respond in writing within 10 business days.
- 6.2 Complaints received by TABT will be managed in accordance with the Complaints and Appeals Policy.

7.0 Review Date

12 months from the date of this version, or as required.

8.0 Version History

Version	Date	Reason for change	Prepared By	Approved By
V1	July 2022	Developed to meet Skills First Funding contract requirements	Marie Vassallo Consulting Australia	CEO
V2	June 2023	Annual Review	Quality & Compliance Manager	CEO
V3	May 2024	Annual Review	Quality & Compliance Manager	CEO

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